Representor ID: RP-140

UI Representor ID: 382

UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy: Policy INF1		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
Compliancy Comment		
Policy INF2 establishes an "Infrastructure First" approach, requiring that development is supported by necessary infrastructure delivery. The policies cross-reference the accompanying Infrastructure Delivery Plan (IDP) as the mechanism for identifying and sequencing infrastructure needs. However, the IDP does not contain a dedicated section on Olney's infrastructure requirements. Given that: 1. The Plan needs to allocate (per these representations) Land NW Olney for around 200 homes 2. The proposed allocation is adjacent to existing built development (Yardley Manor) but will require new connections to services 3. Infrastructure delivery is a Plan requirement for sound housing provision (NPPF paragraph 74) The absence of Olney from the IDP means the Plan lacks clarity on: • What highways improvements are required • What school capacity needs to be added • What healthcare/community facilities are required • Phasing and funding mechanisms • Infrastructure standards and specifications This creates risk of under-delivery and does not comply with NPPF paragraph 34 (plan making should be supportive of infrastructure provision).		
Modification Comment		
Prepare a dedicated Olney Infrastructure Delivery section within the Infrastructure Delivery Plan, setting out: 1. Highways Infrastructure: • Junction improvements at Yardley Road/Aspreys, including off-site works to facilitate capacity • Connections to existing public transport network and enhancement of bus service provision • Redways (active travel) connections to existing network and town centre		

- Cost, phasing, and funding mechanisms

2. Education Infrastructure:

- Primary school pupil yield (ca. 30–40 pupils based on 200 homes)
- Options: provision of facilities on-site within development, or financial contribution to expanding existing provision at Olney Middle School or proposed expansion
- Cost and mechanism

3. Healthcare and Community:

- GP surgery capacity; options for on-site provision or expansion of existing capacity
- Expansion of existing community facilities or provision within development
- Cost and mechanism

4. Open Space and Recreation:

- Requirements per Policy CEA8 (Provision and Protection of Accessible Open Space) and Annex C
- Onsite delivery vs. financial contributions to existing facilities
- Cost and phasing

5. Utilities (utilities companies to confirm):

- Water supply and wastewater capacity
- Electricity and gas supply
- Broadband / digital infrastructure

6. Phasing and Delivery Model:

- Proposed phasing (e.g., 100 homes in phase 1 with infrastructure delivery, 100 in phase 2)
- Trigger points for infrastructure delivery
- Mechanism for securing funding (s106, CIL, developer delivery)

Additionally, amend Policy INF2 to include a reference to Olney:

"Strategic allocation sites identified in Policies GS1A [and others]... will be delivered in accordance with the infrastructure requirements set out in the Infrastructure Delivery Plan, with planning permissions and s106 agreements ensuring that appropriate infrastructure is provided in phase with development."

Rationale for modification:

1. Effective: Detailed IDP provisions provide confidence that housing can be delivered with necessary supporting infrastructure.
2. Positively prepared: The modification demonstrates the Council's active planning for Olney's infrastructure needs.
3. Consistent with NPPF: The modification aligns the Plan with paragraph 34 (plan making supportive of infrastructure).

Appear at examination?	No

Appear at examination reason?

Representor ID: RP-140

UI Representor ID: 382

UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy: Policy GS2		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
Compliancy Comment		
Table 1 of Policy GS2 contains no housing figure for Olney or any other rural settlement beyond existing commitments. This is unsound for the following reasons: (a) Inconsistent with NPPF requirement for mixed site supply: NPPF paragraph 73 states: "A wide choice of high-quality homes, to meet the needs of different groups in the community... can be best achieved where there is a good supply of land for housing. Strategic policy-making authorities should... include a mix of sites of different sizes, reflecting the requirements of paragraph 69, to promote competition in the market for land and to ensure that provisions of Government advice on build-out rates do not inhibit the ability of sites to be developed at suitable densities. Where there are groups of smaller settlements, growth should be supported in one village which may support services in a village nearby." The current strategy is dominated by five large strategic sites (Eastern Extension 7,750, East of Wavendon 2,250, South of Bow Brickhill 1,300, Levante Gate 1,250, Shenley Dens 1,000). These account for approximately 13,550 homes of the 37,000 new allocations, or 36.6% of new supply. By excluding mid-sized sites at sustainable rural settlements (such as Olney's proposed 200-dwelling allocation), the Plan: • Undermines site diversity • Creates risk of under-delivery if the large strategic sites face constraints • Fails to support competitive market functioning (b) Ineffective: Reliance on Neighbourhood Plans is uncertain: The Plan (paragraph 22) states: "As identified in Policies GS1 and GS2 below, we still expect local communities to plan for growth... through Neighbourhood Plans. Where groups want to prepare or review a Neighbourhood Plan, we expect Neighbourhood Plans to plan for a minimum of one dwelling..." This approach places housing delivery responsibility on local communities and neighbourhood plans rather than the strategic authority. Whilst partnership with communities is valuable, this is not an effective delivery mechanism for the Plan's housing requirement because:		

1. Neighbourhood Plans are discretionary: The Council cannot compel a Town Council to prepare or review a Neighbourhood Plan. If Olney Town Council chooses not to prepare a revised Neighbourhood Plan, there is no strategic fallback to deliver housing for Olney.
2. Neighbourhood Plans were not designed for plan-period quantified allocations: The current Olney Neighbourhood Plan (adopted 2019) allocated 300 homes to 2031. It does not address needs from 2031–2050. The Neighbourhood Plan process could be lengthy and uncertain, risking that growth stalls if a new plan is not made.
3. Uncertainty over housing needs: The Plan assumes (without allocation or specific figure) that Neighbourhood Plans will provide appropriate growth. However, in the absence of a strategic housing figure for Olney, Town Councils lack guidance on their fair share of housing needs.
4. Precedent: The current Olney Neighbourhood Plan (para 6.2) records that the Council advised the Town Council in August 2014 to plan for 325–350 homes (across 2014–2031), subsequently revised to 200–250 homes due to competing demands from Newport Pagnell. The Town Council allocated 300 homes as a compromise. This history shows that strategic LPA guidance is essential to direct neighbourhood planning.

By providing no strategic housing figure or allocation for Olney, the Plan places the LPA's obligation to provide housing entirely on communities. This is not an effective strategy consistent with NPPF requirements, particularly with the recent withdrawal of Government grants for neighbourhood planning.

(c) Not positively prepared: No evidence-base assessment of proportionate growth: The Plan's "Growth Strategy Topic Paper" considered options for Olney, including a "Recommended Growth Option" with c. 1,000 homes (noted in paragraph 9). This was tested against other options and rejected as too large. However, the Plan then leaps to the conclusion that zero allocation is justified, without testing intermediate options.

The SHLAA (November 2025 and also the July 2024 version) assesses the Land North West of Olney (residual part of Site E in the Olney Neighbourhood Plan) - Site ID 111921 - as "Suitable, Developable, Available" for approximately 200 homes. This is precisely a proportionate figure that the Council should have tested.

The absence of this assessment in the evidence base means the Plan is not positively prepared. The Council has not actively considered how to support Olney's role or tested whether modest, proportionate growth is appropriate. This is inconsistent with NPPF paragraph 8, which sets three over-arching objectives:

(a) An economic objective: including "supporting a strong, responsive and competitive economy… and supporting existing businesses to adapt and grow." Olney's service base (shops, schools, health, employment) is a local economic asset. A plan that provides zero growth for 28 years undermines Olney's ability to maintain competitive services and support local employment.

(b) A social objective: including "supporting strong, vibrant and healthy communities." A market town that cannot grow risks decline, loss of services, and reduced vitality. NPPF paragraph 83 explicitly states that planning should support rural communities to thrive.

(c) Environmental objective: including "contributing to protecting and enhancing the natural, built and historic environment." By forcing all growth to large extensions around a single city, the Plan increases commuting distances for people living in Olney who might work in the town or surrounding region. Supporting local employment and services via housing growth at Olney would reduce travel distances and support sustainability.

Modification Comment

Amend Table 1 of Policy GS2 by adding a new row:
Olney (Market Town) – Strategic Allocation 200
REVISED TOTAL housing supply 59,979
"To ensure our minimum housing requirement is met, the MK City Plan 2050 will provide for a minimum of 50,372 net new homes over the period 2022–2050. In line with the spatial strategy within Policy GS1, a total of 59,979 homes are planned to provide an adequate buffer on meeting the minimum housing requirement and to support the growth ambitions set out within the Strategy for 2050, including support for the market town of Olney as a key sustainable settlement. These homes will be delivered through the sources of supply set out in Table 1 and through..."
Revised Policy GS2 Part A, clause 2:
"Neighbourhood Plans that allocate for at least one new home and ensure development within or adjoining settlements is of a scale appropriate to the size, infrastructure capacity and range of amenities of the relevant settlement or area within the City of Milton Keynes. In Olney, the strategic allocation of approximately 200 homes (as set out in Table 1) is in addition to any growth accommodated through a revised Neighbourhood Plan."
Rationale for modification:
1. Effective delivery: The modification provides certainty that housing will be delivered in Olney via a strategic allocation, removing reliance on an uncertain Neighbourhood Plan process.
2. Positive preparation and justified: The modification is justified by the SHLAA assessment of the Land North West of Olney (residual part of Site E in the Olney Neighbourhood Plan) as suitable and deliverable, and by evidence of Olney's role as a service centre.
3. Consistent with national policy: The modification aligns the Plan with NPPF paragraphs 73–74, 77–83 regarding support for rural settlements and site diversity.
4. Resilience: The addition of a 200-dwelling site to Table 1 improves the Plan's overall resilience and site diversity, reducing reliance on large strategic sites.

Appear at examination?	Yes

Appear at examination reason?

Land & Partners Ltd are promoting a strategic site at the second largest settlement in the Borough (Olney) and have submitted detailed representations raising concerns that the City Plan's spatial strategy and housing distribution – particularly the scale

Representor ID: RP-140

UI Representor ID: 382

UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy: Policy GS1		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
Compliancy Comment		
The spatial strategy fails to recognised Olney's established role as a market town, which involves acting a key service centre for the surrounding rural area. This is unsound for the following reasons: Firstly, it is inconsistent with NPPF rural housing policy: NPPF paragraph 83 states: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." NPPF paragraph 74 requires: "Significant extensions to villages and towns can often be the best way of achieving the supply of large numbers of new homes… Strategic policy-making authorities should identify suitable locations for such development… This should ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities…" Olney is manifestly not a village but a historic market town of 7,000+ inhabitants. It contains: • Multiple schools (Ousedale Academy, Middle School, Infant Academy) • Extensive retail facilities (multiple supermarkets, named shops, district centre designation per Policy GS5) • Significant employment (Stilebrook Road Industrial Estate, Olney Office Park, Olney Park mixed-use development) • Public transport (bus services to Milton Keynes, Bedford, Northampton) • Leisure facilities (recreation grounds, sports clubs, parks, riverside access) • Healthcare and nursery provision (included in Olney Park development) As confirmed by the made Olney Neighbourhood Plan (policy/vision), Olney is described as "a thriving, dynamic and historic town" serving as a focus for services and local jobs across an extensive rural hinterland. This precisely matches the NPPF definition of a settlement where housing growth should be supported to maintain and enhance vitality. By confining Olney to "local needs only" the same as any village the		

Plan fails the NPPF requirement to support growth in sustainable rural settlements that can benefit the wider rural area i.e. all the 'satellite' villages around it.
The Vale of Aylesbury Local Plan (VALP, adopted 2021) provides a directly relevant precedent. At Winslow – a historic market town which the Plan describes as "one of the most sustainable settlements within Aylesbury Vale" – a made Neighbourhood Plan already allocated 455 homes. Notwithstanding this, VALP allocated strategic site WIN001 for at least 315 additional dwellings on land outside the existing settlement boundary. The Plan records that this land lay within the Winslow Neighbourhood Plan area and that the neighbourhood plan review was only at an early stage, yet the strategic allocation was made through the Local Plan rather than deferred to the review.
In his Report, the VALP Inspector explicitly endorsed the approach of the Local Planning Authority allocating a strategic site at Winslow. He concluded that an alternative strategy which merely set targets and left allocations to Neighbourhood Plans would delay a complete development plan and that "[t]here could be no guarantee that Neighbourhood Plans would ever come forward or succeed in making the allocations to meet the targets". He preferred VALP's approach of allocating sites in the Local Plan, which provided earlier certainty.
Olney occupies an equivalent role within the City of Milton Keynes: it is a historic market town and District Centre serving a wide rural catchment, with a made Neighbourhood Plan and Town Council. Olney is actually larger (6,600 in the 2021 census) than Winslow (5,236 in the 2021 census). As in Winslow, a SHLAA-tested strategic site exists adjacent to the town (Land North West of Olney), suitable for proportionate growth.
In light of the VALP precedent, it is not sound for the MK City Plan 2050 to rely solely on an uncertain future Neighbourhood Plan review to bring forward proportionate growth at Olney. Consistent with the approach endorsed by the VALP Inspector, the sound and effective strategy is for the strategic authority itself to allocate a proportionate site at this sustainable market town through the Local Plan, with any Neighbourhood Plan playing a complementary role.
Secondly, this approach is inconsistent with previous adopted policy:
The MK City Plan 2050 proposes to remove the entire key settlement tier from the adopted Local Plan, downgrading Olney to the same status as an isolated village with no services. This is a radical departure from adopted policy with no evidence-base justification. The Plan's evidence base (Strategy for 2050, HEDNA, Sustainability Appraisal) does not explain why the key settlement tier has been abandoned; nor does it assess the consequences for service-centre viability.
The adopted Milton Keynes Core Strategy (2013) recognised three "key settlements" explicitly:

- Newport Pagnell
- Olney
- Woburn Sands

The adopted Plan:MK (2019) confirmed this hierarchy. Its Settlement Hierarchy (Policy DS1) provided a 3-tier structure:

- Tier 1 - Urban area
- Tier 2 - Key settlements (Newport Pagnell, Olney, Woburn Sands)
- Tier 3 - Villages

The Plan:MK Inspector's Report (established that Olney is a Key Settlement where rural growth must be concentrated and that the allocation of growth must be "reflective of the size and function" of the town.
In the Inspector's initial letter, he challenged the Council on whether it was sound to allocate no additional growth to rural areas, proving that "positive growth" in these locations was a key matter he interrogated.
Quote from Inspector's Initial Observations (May 2018), Page 7:
"Is a strategic policy framework which allocates no additional, positive growth to the rural areas over the period to 2031 an appropriate and/or sound approach? ... I find the presentation of Policy DS1 particularly vague in relation to the role of key settlements... I would be grateful to know why the LPA has chosen this approach... and why is it considered to be the most appropriate."
The Inspector duly required a Main Modification (MM5) to the plan specifically to clarify that Key Settlements must be the focus for rural growth. This inserted a new paragraph as follows:
"The provision of new homes and jobs will take account of the settlement hierarchy set out in table 4.2. The majority of development will be focused on and adjacent to, the existing urban area of Milton Keynes at the locations specified in table 4.2 and from selective infill, brownfield, regeneration and redevelopment opportunities. Within the rural area of the Borough most new development will be concentrated within the key settlements of Newport Pagnell, Olney and Woburn Sands. Elsewhere within the rural area new development will occur within villages and other rural settlements at locations identified in made neighbourhood plans."
Quote from Final Inspector's Report, Paragraph 37:
"MM5 would introduce new text into Policy DS1 which would clarify the primary role of Milton Keynes for new jobs and homes and that within the rural areas the focus for new development will be concentrated at the key settlements with only a limited role for the villages and other settlements. I recommend MM5 so that PlanMK is effective and therefore sound."
Quote from Final Inspector's Report, Paragraph 34:
"The key settlements of Newport Pagnell, Olney and Woburn Sands all have a good degree of services, connectivity and employment which justifies their identification at this tier of the hierarchy."
The Inspector reviewed the level of growth allocated to Key Settlements and endorsed it as "appropriate" and "reflective of the size and function" of the towns. This supports the principle that growth must be proportionate to the settlement's status.
Quote from Final Inspector's Report, Paragraph 35:
"Overall, existing housing permissions and allocations in key settlements account for some 5% of the total housing land supply. I consider this is an appropriate proportion, reflective of the size and function of these settlements and the need to focus development within and around the City."
The excessive concentration of the proposed spatial strategy is likely to be ineffective. The NPPF requires plans to be effective and deliverable; an overly concentrated strategy is less resilient if large projects stall.
Paras 77–78 of the NPPF require plan-makers to "identify a sufficient supply and mix of sites" and to plan for larger-scale development in sustainable locations, ensuring "size and location support a sustainable community, with sufficient access to

services and employment opportunities". By omitting Olney's role, the Plan ignores a clearly sustainable location.
There is a lack of explanation for this approach:

- No evidence-base support: The Core Strategy (2013) and Plan:MK (2019) each included targeted growth at key settlements. What evidence prompted the abandonment of this successful model? The Topic Paper "Our Growth Strategy" does not explain this strategic reversal.
- Misapplication of growth options: The Topic Paper considered a "Recommended Growth Option" that included c. 1,000 homes at Olney. This was rejected as too large. However, the Plan then concludes that no allocation for Olney is justified, without testing the intermediate option of proportionate growth (c. 200 homes). This is not a justified conclusion.
- Risk of service decline: No evidence is presented on the social and economic consequences of preventing growth at Olney. NPPF paragraph 8(b) requires plans to support an "economic objective," including supporting the vitality of town centres and rural settlements. A plan that provides nil growth for 28 years at an existing market town undermines these objectives.

Modification Comment

Revised Policy GS1 Part A:
"Development within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy:
1. Tier 1 – The City of Milton Keynes, as shown on the Policies Map, will be where the majority of development to meet our identified needs will be provided.
2. Tier 2 – Key Sustainable Settlements – Development in the market town of Olney should focus on supporting its role as a service centre and may include strategic housing allocations in addition to meeting local needs, as identified in Policy GS1A and Table 1 of Policy GS2.
3. Tier 3 – Development located within the defined settlement boundaries of other villages beyond the City of Milton Keynes should focus on meeting local needs, including locations identified in relevant made Neighbourhood Plans."
Rationale for modification:
1. Consistency with NPPF: The revised hierarchy explicitly recognises Olney as a key settlement with a role to play in housing delivery, in accordance with NPPF paragraphs 74, 77–83.
2. Positively prepared: The modification signals the Council's positive intent to support Olney's continuing role as a market town, consistent with the evidence base (Olney's existing services, employment, connectivity) and with the principle that rural settlements should be able to thrive.
3. Effective and deliverable: By introducing Tier 2 as a recognised category, the Plan becomes more resilient and delivers a more balanced distribution of sites.
4. Justified: The modification is justified by the evidence of Olney's existing role (Plan:MK policy DS1, Olney Neighbourhood Plan, current facilities and services) and by NPPF national policy.

Appear at examination?	Yes

Appear at examination reason?
Land & Partners Ltd are promoting a strategic site at the second largest settlement in the Borough (Olney) and have submitted detailed representations raising concerns that the City Plan's spatial strategy and housing distribution – particularly the scale

Representor ID: RP-140

UI Representor ID: 382

UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy: Policy GS1		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
Compliancy Comment		
The Plan fails to allocate a strategic housing site at Olney, contrary to NPPF requirements (paragraphs 74, 83) and unsound spatial strategy. The Plan allocates five strategic city extensions around Milton Keynes but provides no strategic allocation for Olney despite: 1. SHLAA designation: The SHLAA identifies the Land North West of Olney (residual part of Site E in the Olney Neighbourhood Plan) as "Suitable, Developable, Available" for approximately 200 homes. The latest (November 2025) SHLAA acknowledges that previous concerns raised by Highways over the impact on the capacity of Yardley Road has been addressed with a highways impact assessment so highway capacity would only become a potential issue if there were other sites delivered prior to this site as part of wider growth. The SHLAA also mentions that impact on views from proposed Special Landscape Area designation may need consideration, but this has already been considered with a landscape assessment that demonstrates the site would not be constrained by this. In contrast, all the other potential directions of growth for Olney are constrained by this proposed Special Landscape Area designation or other issue such as higher risk flood zones and ecological designations. 2. NPPF requirement: NPPF paragraph 74 states: "Strategic policy-making authorities should identify suitable locations for such development [significant extensions to villages and towns] where this can help to meet identified needs in a sustainable way... These should be identified in the strategic policies or allocations in the local plan..." A strategic policy-making authority must allocate suitable sites, not defer them to uncertain Neighbourhood Plans. 3. Consistency with adopted policy: Plan:MK allocated specific housing to rural key settlements (Newport Pagnell 1,400 homes, Olney 300 homes, Woburn Sands 200 homes [via Neighbourhood Plans]). The MK City Plan 2050 provides no equivalent allocations. 4. Risk and effectiveness: Without a strategic allocation, there is a risk that: • Housing delivery at Olney will fall short of Plan expectations • Services will decline		

- The Plan's objective of balanced growth will be undermined

Modification Comment

Insert a new Policy GS1A immediately after Policy GS1:
POLICY GS1A – OLNEY STRATEGIC ALLOCATION
Policy type: Strategic | Objectives: 9, 10 | Site sub-area: Olney
A. Land North West of Olney (approximately 8.65 hectares, as shown on the Policies Map and Inset Map to this Plan) is allocated for approximately 200 net new homes to be delivered between 2022 and 2050.
B. Development of the allocation will be required to:
1. Housing mix and quality: Provide a mix of house types and sizes, including a minimum of 40% affordable housing to be provided as social rent homes, consistent with Policy HQH2.
2. Infrastructure delivery: Deliver or fund appropriate local infrastructure, including:
o Highways improvements to Yardley Road / Aspreys junction and connections to the A509 corridor, in accordance with a Transport Assessment and Highways Delivery Plan to be submitted with any planning application
o Contribution to sustainable transport provision and connections to existing Olney bus services and active travel network
o Primary school provision or financial contribution to expanding existing provision (consistent with Olney's school pupil yield)
o Healthcare and community provision or financial contributions
o Open space provision in accordance with Policy CEA8
3. Environmental and design quality:
o Retain and enhance existing hedgerows and trees; deliver woodland planting in accordance with Policy CEA11 and local landscape character area management guidelines
o Demonstrate no net loss of green cover and achieve minimum Urban Greening Factor scores per Policy CEA11
o Assess potential impact on the proposed Special Landscape Area and implement mitigation measures as required
o Design development to accord with the MK Design Code and placemaking principles in Policy PFHP5
4. Community facilities: Provide or fund local community facilities including open space, play areas, and green infrastructure as identified in a Site Development Brief to be prepared by the Council in consultation with Olney Town Council.
C. The allocation will be released for development subject to:
1. Confirmation of highway capacity and delivery of necessary junction improvements as identified in Transport Assessment
2. Agreement of a development framework and/or masterplan with the Council
3. Evidence that necessary infrastructure can be delivered in accordance with the Infrastructure Delivery Plan
D. Development proposals will be assessed against all relevant policies in this Plan and the requirements set out above. Site development will be required to be phased to ensure coordination with infrastructure delivery.
Rationale for modification:

1. Effective: By allocating the site, the Council signals clear support and reduces uncertainty for the site promoter and delivery partners.
2. Positively prepared and justified: The allocation is justified by the SHLAA assessment and the site's location within the same field as existing residential development allocated in the current Neighbourhood Plan (Site E) and under construction as Yardley Manor.
3. Consistent with national policy: The allocation complies with NPPF paragraphs 74 and 83 by identifying a suitable location for development that will support a sustainable rural settlement.
4. Resilience: The allocation provides housing supply diversity and reduces risk of under-delivery across the Plan period.

An alternative modification would be to specify that a revision to the Olney Neighbourhood Plan should allocate a site or sites for around 200 dwellings, which would allow the Town Council to lead the site-selection process. This option is considered to be less favourable as there is less certainty it will result in an allocation.

Appear at examination?	Yes

Appear at examination reason?

Land & Partners Ltd are promoting a strategic site at the second largest settlement in the Borough (Olney) and have submitted detailed representations raising concerns that the City Plan's spatial strategy and housing distribution – particularly the scale

Representor ID: RP-140

UI Representor ID: 382

UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy: Policy GS5		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
Compliancy Comment		
Olney is defined as a "District Centre" for retail purposes but denied role as a settlement tier for housing, contradicting the spatial strategy. Policy GS5 establishes a retail hierarchy for town centres: • Town Centres (CMK, Central Bletchley) • Local Centres The Policy's supporting text and Annex K ("Local Centres") classifies Olney as a "District Centre" (equivalent to a primary market/service town). This classification confirms that Olney has a significant role in the retail and service hierarchy, serving an extensive catchment beyond the town itself. This creates an internal contradiction in the Plan: • For retail/services: Olney is a "District Centre" worthy of policy support and investment (Policy GS5) • For housing: Olney is relegated to Tier 2 ("local needs only"), equivalent to small villages (Policy GS1) This is illogical and unsound: A market town that is recognised as a District Centre (drawing customers from a wide area, supporting multiple retail and service functions) has both the capacity and the need for housing growth to sustain its role. By providing nil strategic housing allocation, the Plan risks undermining the very services that justify its District Centre status. NPPF paragraph 83 requires that housing policies "should identify opportunities for villages to grow and thrive, especially where this will support local services." Olney's District Centre status proves it has local services worthy of support; these services require residents (and thus housing) to remain viable.		
Modification Comment		
Amend Policy GS5 supporting text to include: "Olney is designated as a District Centre, reflecting its role as a market town and service centre serving an extensive rural catchment. This role is supported through the strategic housing allocation in Policy GS1A, which will sustain and enhance the viability of Olney's retail, community and employment functions as a key service centre."		

Rationale for modification: 1. Internal consistency: The modification aligns the Plan's treatment of Olney across retail and spatial strategy policies. 2. Positively prepared: The modification reinforces the Council's commitment to sustaining District Centre viability through appropriate housing growth. 3. Justified: The modification is grounded in the evidence that Olney's existing functions justify sustained service provision.	
Appear at examination?	No
Appear at examination reason?	

Representor ID: RP-140

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UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy:		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
A recommended growth option was presented in the Strategy for 2050 which would have seen growth directed towards Central Milton Keynes, Olney, east of the M1/Newport Pagnell, west of Cranfield, Woburn Sands and the Brickhills. The recommended growth optio		
Compliancy Comment		
Paragraph 9 references the Strategy for 2050, which recommended a growth option including Olney as a potential location alongside Central Milton Keynes, Newport Pagnell, Woburn Sands, and the Brickhills. The Topic Paper "Our Growth Strategy" (section on options appraisal) notes that: • Option 3 included "strategic growth of around 1,000 homes at Olney" • Option 4 included similar large-scale growth at Olney • These options were assessed and rejected (Figure 5, page 14 Topic Paper) However, the evidence base contains a critical flaw: it assesses only a binary choice of around 1000 homes or none at all. The evidence base does not test intermediate options. The 1,000-home figure was informed by the Strategy for 2050's consideration of whether Olney could, in a 25-year horizon, accommodate Borough-wide growth if a major bypass or rapid transit connection were built. This was an extreme scenario, not an assessment of Olney's own housing needs. The failure to test proportionate-growth options means the Plan's rejection of all housing at Olney is not based on a justified evidence base. NPPF paragraph 31 requires local plans to be based on evidence: "The plan-making authority will need to ensure that the development plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area." An evidence base that tests only extreme options (1,000 homes or zero) without considering a proportionate option (200 homes) is inadequate.		
Modification Comment		
Amend paragraph 9 of the Plan with the following amended text: "A recommended growth option was presented in the Strategy for 2050 which would have seen growth directed towards Central Milton Keynes, Olney, east of the M1/Newport Pagnell, west of Cranfield, Woburn Sands and the Brickhills. The		

Strategy's consideration of Olney included a broad assessment of potential for very large-scale growth (c. 1,000 homes) contingent on major infrastructure (bypass/rapid transit). However, this was not an assessment of Olney's own housing needs or proportionate growth appropriate to a market town.
The recommended growth option was informed by evidence but was still only indicative and these options, together with a range of others, required testing through the preparation of a local plan. Through this testing, this plan has identified that proportionate, strategic growth at Olney (approximately 200 homes) is justified to support the town's role as a key sustainable settlement and market town, whilst the very large-scale options considered in the Strategy for 2050 remain inappropriate without major trunk-road or rapid-transit infrastructure delivery."
Additionally, amend the "Our Growth Strategy" Topic Paper to include a section on Olney options appraisal:
"Olney Growth Options Assessment
The Strategy for 2050 options appraisal tested scenarios at Olney ranging from c. 500 homes to c. 1,000 homes, contingent on delivery of major bypass or rapid-transit infrastructure. These options were evaluated against the wider borough growth strategy and rejected in favour of focusing growth at Central Milton Keynes and major city extensions.
However, the options appraisal did not assess proportionate growth at Olney appropriate to its existing role and size as a market town and key service centre. The SHLAA identifies the Land North West of Olney (residual part of Site E in the Olney Neighbourhood Plan) as "Suitable, Developable, Available" for approximately 200 homes. This figure is proportionate to:

- Olney's existing population (around 7,000)
- Its role as a service and employment centre serving an extensive rural catchment
- The historic housing allocation for Olney in Plan:MK and the Olney Neighbourhood Plan (1,760 homes 2010–2026; 300 homes 2019–2031)
- NPPF guidance to support growth in sustainable rural settlements

An allocation of approximately 200 homes for Olney (2022–2050) is therefore justified and has been included in Table 1 of Policy GS2."
Rationale for modification:
1. Justified: The modification remedies the evidence base by demonstrating that proportionate growth options at Olney were considered and found sound.
2. Consistent with national policy: The revised evidence explanation shows adherence to NPPF requirements to support proportionate growth at sustainable settlements.
3. Adequate and up-to-date evidence: The modification references the SHLAA assessment, which is the most recent evidence available.

Appear at examination?	Yes

Appear at examination reason?

Land & Partners Ltd are promoting a strategic site at the second largest settlement in the Borough (Olney) and have submitted detailed representations raising concerns that the City Plan’s spatial strategy and housing distribution – particularly the scale

Representor ID: RP-140

UI Representor ID: 382

UI Representation ID: 854

Representor Name: Thomas Hutchinson

Representor Organisation: Land & Partners Ltd

Policy:		
Legal Compliant:	**Soundness Compliant:** No	**Duty to Cooperate Compliant:**
Paragraph		
This strategy seeks to protect the character of our villages and rural communities, which are principally located to the north of the city, and direct development to the City of Milton Keynes, both within and adjoining it, as a highly sustainable location		
Compliancy Comment		
The Plan is not positively prepared nor justified. NPPF 2024 Para 77–78 requires plan-makers to "identify a sufficient supply and mix of sites" and to plan for larger-scale development in sustainable locations, ensuring "size and location support a sustainable community, with sufficient access to services and employment opportunities". By omitting Olney's role, the Plan ignores a clearly sustainable location. The Plan states (paragraph 23) that "In rural locations the MK City Plan 2050 does not allocate standalone sites or extensions to rural settlements to provide strategic development." The Council also states (FAQ summary) that it intends "no new allocations around Olney", further confirming a strategic choice to exclude the town from growth. There is a lack of explanation for this approach: • No evidence-base support: The Core Strategy (2013) and Plan:MK (2019) each included targeted growth at key settlements. What evidence prompted the abandonment of this successful model? The Topic Paper "Our Growth Strategy" does not explain this strategic reversal. • Misapplication of growth options: The Topic Paper considered a "Recommended Growth Option" that included c. 1,000 homes at Olney. This was rejected as too large. However, the Plan then concludes that no allocation for Olney is justified, without testing the intermediate option of proportionate growth (c. 200 homes). This is not a justified conclusion. • Risk of service decline: No evidence is presented on the social and economic consequences of preventing growth at Olney. NPPF paragraph 8(b) requires plans to support an "economic objective," including supporting the vitality of town centres and rural settlements. A plan that provides nil growth for 28 years at an existing market town undermines these objectives. This excessive concentration creates an ineffective strategy. The NPPF requires plans to be effective and deliverable; an overly concentrated strategy is less resilient if large projects stall.		

Table 1 of Policy GS2 shows the housing supply distribution that results from the spatial strategy summary in paragraph 23: approximately 90% of all growth is directed to Milton Keynes City extensions and infill (Central Milton Keynes, Eastern Strategic Extension, East of Wavendon, South of Bow Brickhill, Levante Gate, Shenley Dens, etc.). All rural settlements (Olney, villages, Neighbourhood Plans) are expected to deliver through undefined "local needs" provisions.

This extreme concentration:

- Creates delivery risk: If large sites encounter delays (land assembly, infrastructure, permissions), the Plan has minimal contingency in diverse locations.
- Ignores NPPF guidance on site diversity: NPPF paragraph 73 emphasises that plans should include a mix of large, medium and small sites to support a range of needs and promote competition in the market.
- Undermines sustainability: By forcing all growth to Milton Keynes City whilst ignoring the potential for proportionate development elsewhere, the Plan neglects opportunities to support existing service networks and active travel patterns in sustainable settlements.

This is setting up a situation in which the Borough will quickly become heavily dependent on very large schemes. Once the current commitments are used up (which have a range of site sizes and types) most of the growth will come from allocations of 2000+ homes (notably the 7,750 Eastern SCE, 5,000 MK East, 3,000 SEMK and 2,250 East of Wavendon), each requiring major infrastructure. With East of Wavendon not expected to deliver until 2038, it puts considerable pressure on the other three large sites to keep to the trajectory.

According to the third edition of Lichfields' 'Start to Finish: How quickly do large-scale housing sites deliver', sites of this scale are the most prone to delay and optimistic delivery bias. If one major site stalls due to infrastructure funding delays, a significant portion of the housing trajectory fails. In contrast, a balanced portfolio, allows for a mix of small, medium, and large sites to ensure consistent delivery.

The ECSE assumed delivery rates are clearly optimistic, even allowing for the platform provided by the MK East infrastructure. The plan assumes the ESCE will deliver 7,750 homes within the plan period. The average lead-in time for sites of 2,000+ units is 6-8 years from validation to first completion. Even if the plan is adopted by 2026, realistic delivery might not start until 2032-2034. To deliver 7,750 homes between 2033 and 2050 (17 years), the site must average around 455 dwellings per annum (dpa). Start to Finish data shows that sites of 2,000+ units typically average around 160 dpa. Even the highest-performing schemes rarely sustain >300 dpa without significant "market absorption" challenges. The implied delivery rate is likely double what is historically achievable.

Modification Comment

Replace Paragraph 23 with the following wording:

"This strategy seeks to protect the character of Milton Keynes City itself and ensure that rural communities thrive. It directs the majority of development to the City of Milton Keynes as the primary growth location, while also supporting proportionate growth at key sustainable rural settlements where this will enhance or maintain their role as service centres. In rural locations, the MK City Plan 2050 allocates extensions to the most sustainable settlements where identified needs justify growth."

Rationale for modification: 1. Consistency with NPPF: Key rural service centres should be recognised for their role to play in housing delivery, in accordance with NPPF paragraphs 74, 77–83. 2. Positively prepared: The modification signals the Council's positive intent to support Olney's continuing role as a market town, consistent with the evidence base (Olney's existing services, employment, connectivity) and with the principle that rural settlements should be able to thrive. 3. Effective and deliverable: By introducing a new tier in the settlement hierarchy, the Plan becomes more resilient and delivers a more balanced distribution of sites. 4. Justified: The modification is justified by the evidence of Olney's existing role (Plan:MK policy DS1, Olney Neighbourhood Plan, current facilities and services) and by NPPF national policy.	
Appear at examination?	Yes
Appear at examination reason?	
Land & Partners Ltd are promoting a strategic site at the second largest settlement in the Borough (Olney) and have submitted detailed representations raising concerns that the City Plan's spatial strategy and housing distribution – particularly the scale	

OLNEY NEIGHBOURHOOD PLAN

2016 to 2031



May 2017

This is the Neighbourhood Plan for Olney which, if adopted by the residents in the referendum, will provide the framework for all planning decisions for the town until 2031.

It has been prepared by a Steering Group working on behalf of Olney Town Council with support and a significant contribution from our Town Clerk, Mr Liam Costello.

The Plan has been based on all the information from extensive consultation, including three town wide questionnaires and several drop-in sessions. There has been both formal and informal consultation with Milton Keynes Council, and formal consultations with the statutory consultees such as Natural England and Anglian Water. Meetings have been held with all the relevant landowners or their agents.

We have written the Olney Neighbourhood Plan to match the views of the residents of Olney and we recommend its adoption to you.

Councillor Joe Stacey

Chairman of the Neighbourhood Plan Steering Group

January 2017

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GLOSSARY OF TERMS

There are technical aspects to planning which may present challenges for those unfamiliar with the planning system. The table below is a simplified explanation of the key terms in the Document. A comprehensive glossary of planning terms can be found in Annex 2 of the National Planning Policy Framework (NPPF) http://planningguidance.planningportal.gov.uk/

Term	Definition
Affordable housing	Social rented, Affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.
Core Strategy	The Milton Keynes Council Core Strategy was adopted in July 2013. It will guide the future development of the Borough and contains strategic policies and sets the framework for future detailed policies and Neighbourhood Plans.
Local Plan	This was the main planning policy document for the Borough until replaced by the Core Strategy. It contains strategic policies, detailed policies to guide the location and nature of development and policies and proposals for specific sites.
Plan:MK	Plan:MK will be the new Local Plan for Milton Keynes which, once adopted, will determine how much new development is needed and where it should go, and includes detailed policies that will be used when making decisions on planning applications.
Intermediate housing	Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not Affordable rented housing.
NPPF	National Planning Policy Framework is a document setting out the national government's main policies on planning.
Section 106	Section 106 agreements, are legally enforceable planning obligations entered into under the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal, typically requiring developers to make financial contributions, or provide community infrastructure.
Settlement Boundary	The dividing line, or boundary, between areas of built/urban development (the settlement), and non-urban or rural development – the open countryside.

1. INTRODUCTION

1.1. Olney is a market town of about 7,600 inhabitants situated in the north of Buckinghamshire. With the river Great Ouse defining the southern and eastern boundaries of the parish, the historic conservation area of the town runs north from the river and includes the mediaeval church, the market place and the High Street, which is lined with a number of listed buildings.

1.2. Most of the newer development is on the north and west of the town. There is an industrial estate to the north and most of the retail outlets are centred on the market place and the adjacent courtyards. The town is served by three schools and a number of churches. There are extensive sports facilities on the playing fields that stretch from the built up area to the river on the east. A doctor's surgery and a library are located in a central position. Olney acts as a service centre for the adjacent villages in that it provides a range of retail outlets, services and eating places.

1.3. Milton Keynes Council (MKC) is the unitary authority. Olney Town Council (OTC) consists of 15 councillors headed by the town Mayor. The town is administered by the Town Clerk and Assistant Town Clerk and there is a three-person grounds maintenance team. The Council is responsible *inter alia* for maintaining all playing fields, road verges, green areas and flowerbeds. It runs weekly and monthly markets, and well supported annual events. It manages 150 allotments, a cemetery and the Olney Centre, the latter serving as the council's administrative base as well as a venue for local groups' activities.

1.4. There are six committees each with delegated powers: they are the Finance, Recreation and Services, Olney Centre Management, Planning, Personnel and the Dickens of a Christmas. The Neighbourhood Plan Steering Group also has delegated powers. The annual turnover controlled by the Council is in excess of £300,000 per annum.

1.5. Under the Localism Act 2011, parishes and communities were given the legal right to prepare a Neighbourhood Plan that regulates development in their own area. In the autumn of 2013 OTC decided to prepare a Neighbourhood Plan for the town which, when passed by a referendum of the citizens of Olney, would define the future development of the historic town. A Neighbourhood Plan Steering Group was set up consisting of five town councillors and five community members who were active in the community. It now consists of six councillors and seven community members who between them have a wide range of relevant expertise and knowledge.

1.6. An application was made to MKC to define the Neighbourhood Area as all the land within the Parish boundary. This was agreed, as was the proposal that OTC was the appropriate body to prepare the Plan[SE1].

1.7. The first action of the Steering Group was to issue a questionnaire[SE2] to every Olney household. The subjects covered were housing, commercial development, employment, the town centre, parking, open spaces, health and education, people and other issues. As well as the yes/no type questions each category had an item inviting comments to ensure that all views and concerns could be expressed. In the month after the questionnaire was issued two drop-in consultation sessions were held at the Olney Centre so that residents could discuss the matters raised in the questionnaire with members of the Steering Group. There were 640 replies to the questionnaire and they contained 5,209 comments[SE3].

1.8. As the subject of housing was so important, early in 2015, the Steering Group commissioned an independent consultant, Community Impact Bucks, to carry out a Housing Needs Analysis[SE4]. The same organisation prepared a document summarising the results of the whole questionnaire[SE5].

1.9. During the plan's preparation, the Steering Group published progress articles in Phonebox, a monthly magazine delivered to every household in Olney and surrounding areas[SE6].

1.10. As the numbers and locations of housing and the safeguarding of employment sites were such key issues, and there were indications of proposals being prepared by developers, a Site Allocations Consultation document[SE7] was issued to all Olney households in August 2015. It contained proposals for housing numbers and the preferred location of sites based on the responses to the earlier questionnaire. A drop-in session was held during the consultation period. The results of the responses to the Site Allocations Consultation document are included in the Site Selection Report[SE8].

1.11. Discussions have been held with the owners of all the possible development sites or their representatives. A record of all meetings held during the preparation of the Neighbourhood Plan is in the Supporting Evidence[SE9].

1.12. The Neighbourhood Plan has been written to be in general conformity with the strategic policies contained in the MKC's Core Strategy[SE10], and any saved polices from its predecessor Local Plan[SE11] where relevant.

1.13. It also recognises that MKC is working on Plan:MK as a successor to the Core Strategy. These three documents and their policies are drawn up in accordance with the National Planning Policy Framework.

1.14. The relevant strategic policies from the Core Strategy are:

CS1	Milton Keynes Development Strategy.
CS2	Housing Land Supply.
CS3	Employment Land Supply.
CS4	Retail and Leisure Development.
CS9	Strategy for the Rural Area.
CS10	Housing.
CS12	Developing Successful Neighbourhoods.
CS13	Ensuring High Quality, Well Designed Places.
CS16	Supporting Small Businesses.
CS17	Improving Access to Local Services and Facilities.
CS19	The Historic and Natural Environment.
CS21	Delivering Infrastructure.

1.15. The relevant saved policies from the 2005 Local Plan are:

HE1	Protection of archaeological sites.
HE2	Buildings of special architectural or historic interest (listed buildings)
HE3	Demolition of a listed building.
HE4	Extension or alteration of a listed building.
HE5	Development affecting the setting of a listed building.
HE6	Conservations areas.
TC1	Olney Town Centre.
TC2	Olney Town Centre.
S10	Open countryside
S11	Areas of attractive landscape
NE1	Nature conservation sites
NE4	Conserving and enhancing landscape character
OY4	Land of Austen Avenue
E6	New buildings for employment uses in the open countryside
H4	Affordable housing: target and site thresholds
H5	H5 Affordable housing: site and market conditions
H7	Housing on unidentified sites
H8	Housing density
L2	Protection of public open space and existing facilities

2. BASIC CONDITIONS

2.1. The Olney Neighbourhood Plan complies with the following basic conditions in that:

2.2. It is in general conformity with the strategic development plan policies and the National Planning Policy Framework.

2.3. It contributes to sustainable development by:

- Safeguarding the existing employment site and making provision for increased local employment.
- Providing for new housing and Affordable housing and a good mix of housing types and sizes.
- Safeguarding a site for a Health Centre.
- Safeguarding a site for community use.
- Protecting and seeking to enhance, public open spaces.
- Endorsing all the existing policies on the town centre and conservation area which relate to preservation and enhancement.

2.4. It is compatible with European Union obligations.

3. VISION STATEMENT

3.1. To maintain Olney as a thriving, dynamic and historic town, preserving where necessary, and improving where possible. To manage change in order to maximise the advantages and minimise the problems.

4. PLAN OBJECTIVES

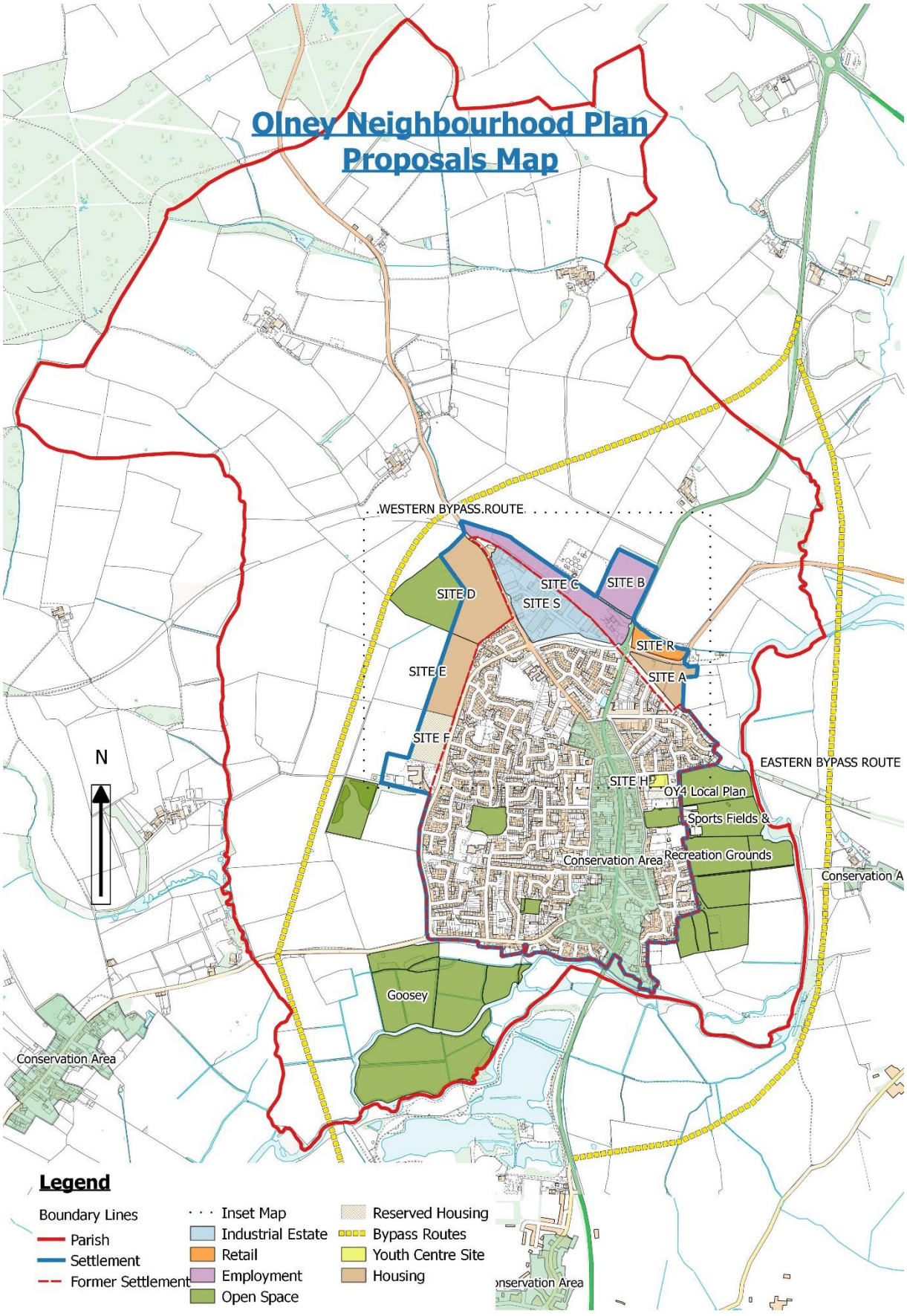
4.1. The Plan, when approved in a referendum, will control development until 2031. However, it is reasonable to assume that the population of the town will continue to grow after that date with the proposed development being mostly to the north and west of the present built-up area.

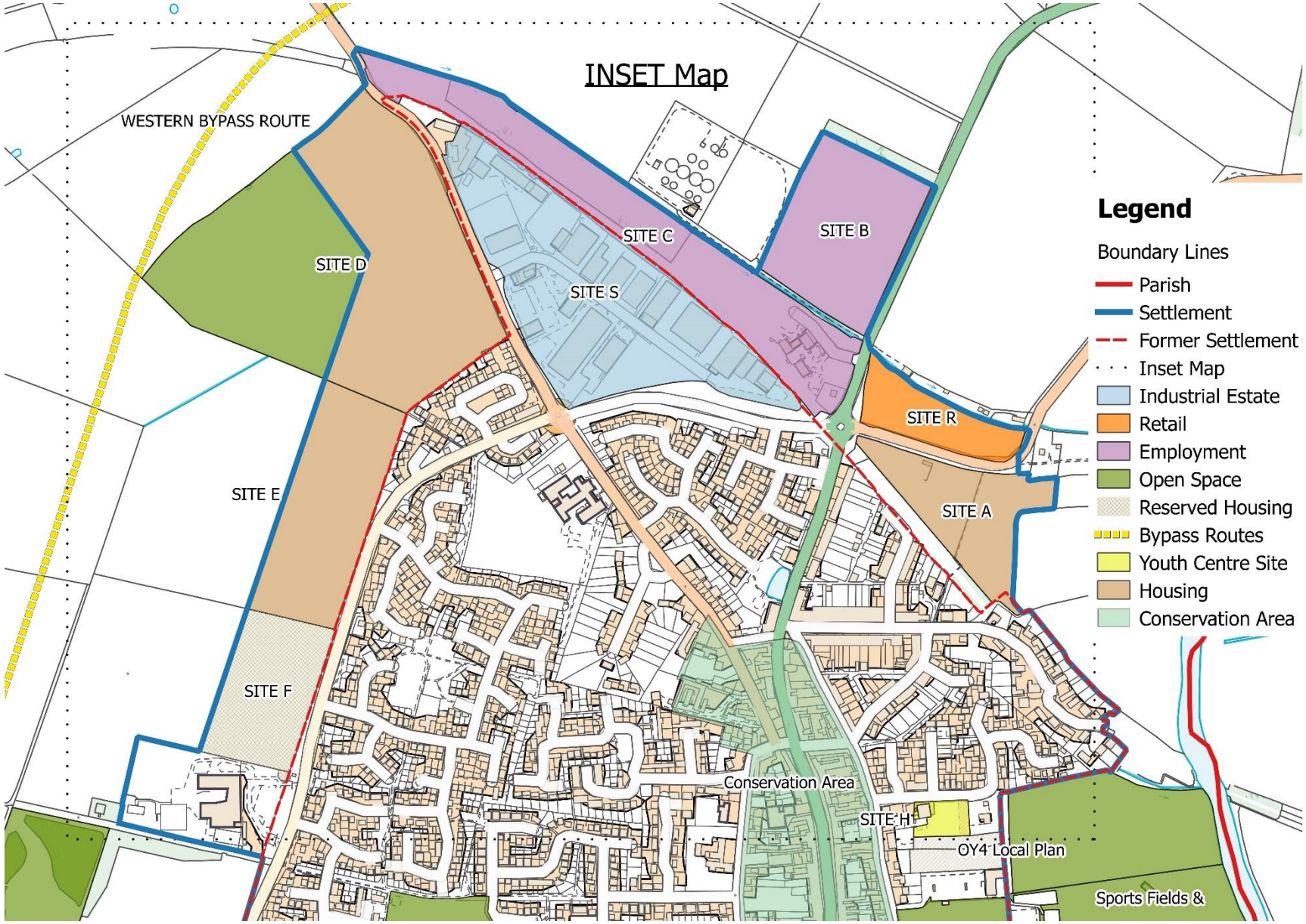
4.2. With that in mind, the objectives of the Olney Neighbourhood Plan are:

1. To ensure that all new housing meets both the Milton Keynes Council (MKC) Core Strategy and Local Plan requirement, and also the requirements of the people of Olney.
2. To ensure that there is sufficient land available to meet future health and community needs.
3. To ensure that there is sufficient land available to meet future educational needs.
4. To allocate land for employment use and safeguard the existing Stilebrook Road Industrial Estate.
5. To allocate land for retail use.
6. To protect and enhance the character, appearance, vitality, viability and significance of the historic town centre, conservation area, and other heritage assets in town.
7. To protect, enhance and provide additional open spaces, community facilities and sports and recreation facilities, both within the town, as part of the new development proposals and between the town and the River Ouse.
8. To improve parking, accessibility, pedestrian, and cycling routes throughout the town.
9. To reduce traffic problems.
10. To use funds arising from developer contributions for improvements to community facilities and infrastructure.

4.3. The Proposals Map is shown on page 10. It details the new settlement boundary and identifies the sites allocated and safeguarded for new housing, employment, health and retail development. The Proposals Map also identifies land that is safeguarded from development, such as the green spaces and recreational areas and employment land to be protected from redevelopment for other uses, and shows the conservation area.

5. PROPOSALS MAP




INSET Map
WESTERN BYPASS ROUTE
SITE D
SITE C
SITE B
SITE S
SITE R
SITE A
SITE E
SITE F
Conservation Area
SITE H
OY4 Local Plan
Sports Fields &
Legend
Boundary Lines
Parish
Settlement
Former Settlement
Inset Map
Industrial Estate
Retail
Employment
Open Space
Reserved Housing
Bypass Routes
Youth Centre Site
Housing
Conservation Area

6. OBJECTIVE 1

TO ENSURE THAT ALL NEW HOUSING MEETS THE MILTON KEYNES COUNCIL CORE STRATEGY REQUIREMENT FOR OLNEY

6.1. BACKGROUND:

6.1.1. The methodology used to determine the number of new homes and their location followed the guidelines in the *Neighbourhood Plans Roadmap Guide* issued by Locality and was broadly consistent with that set out in Planning Practice Guidance – *Housing and Economic Development Needs Assessment*.

6.1.2. The work was done taking into account the overall housing requirements of MKC with Olney taking its "fair share" of the rural allocation.

6.1.3. During the Public Examination of MKC's Core Strategy in July 2012 the Inspector highlighted concerns regarding the need for the short term supply of housing land. The rural targets needed to be achieved to provide some flexibility and contingency to the urban land supply.

6.1.4. MKC immediately started work on Plan:MK which covered the period to 2031 and made a commitment in the Core Strategy that new allocations would be considered during that process.

6.2. HOUSING NUMBERS:

6.2.1. The first task in deciding the number of homes that would be proposed in the Neighbourhood Plan was to determine the number of dwellings that MKC would require Olney to deliver as its 'fair share' of the rural allocation, as set out in the Core Strategy which covers the period to 2026.

6.2.2. The Key Settlements in the rural area are Woburn Sands, Newport Pagnell and Olney. MKC's initial advice[SE12] was to plan for a housing target of 325 – 350 homes which would not only meet the Core Strategy requirement but also pre-empt the need for the additional housing up to 2031 which is likely to be required through Plan MK.

6.2.3. Thus, the questionnaire issued to the public in the autumn of 2014 stated that Olney had to identify sites for 325-350 additional dwellings, and that the figure was non-negotiable.

6.2.4. However, in early 2015 it was learned that Newport Pagnell was, largely by developing the 1,200 home Tickford Farm sites, proposing to provide far more housing than their 'fair share' of the rural total and that would more than meet the whole of the rural housing need set out in the Core Strategy.

6.2.5. MKC's comment[SE13] on these changed conditions was that there was great uncertainty about the timing and other aspects of Newport Pagnell's large development. They said that in that context it was difficult to give an exact figure to go into Olney's plan but a figure of 200-250 was likely to be acceptable. They also pointed out that it was up to the Steering Group to decide how many homes to plan for.

6.2.6. In the Steering Group's Site Allocations Plan Consultation Document, issued to every Olney household in August 2015, it was explained that the results of the questionnaire showed that there was a strong demand for small and Affordable homes for young people and downsizers. This demand for Affordable homes could only be met if there were a larger number of homes built for sale on the open market.

6.2.7. The Steering Group's recommendation in that document was that sites be allocated to provide a total of 300 dwellings up to the end of the plan period in 2031, with 90 of these being dwellings and the remainder being sold on the open market.

6.2.8. In the Site Selection Report[SE8] it can be seen that in response to the question in the Consultation Document 'Do you support the proposal for an additional 300 dwellings?' 190 responders said 'Yes' and 92 said 'No'.

POLICY ONP1 – HOUSING NUMBERS

To meet the MKC Core Strategy Housing requirements up to the end of the Neighbourhood Plan period in 2031, and achieve a sustainable form of development, the Neighbourhood Plan allocates a total of 300 new dwellings across three preferred greenfield release sites as planned residential-led extensions to the town and settlement boundary. All sites will deliver 30% Affordable dwellings in order to create sustainable communities.

6.3. HOUSING LOCATION:

6.3.1. In assessing the various site proposals, the Neighbourhood Plan Steering Group has actively engaged with the landowners and developers of each site to test that the proposed site allocations, policy themes, and issues raised during the consultation with residents have been addressed.

6.3.2. In September 2014 MKC published a *Site Allocations Plan – Issues and Options Consultation*[SE14] which showed all the sites in Olney where landowners had registered an interest in development. The Steering Group met with all the landowners or their agents to listen to their aspirations for the sites.

6.3.3. This *Site Allocations Plan – Issues and Options Consultation* gave summaries of both site opportunities and constraints, and of initial sustainability appraisal findings. Whilst there were issues of location, wildlife and visual impact on some of the sites there were no factors on any of the sites that would either preclude development or be highly costly to deal with.

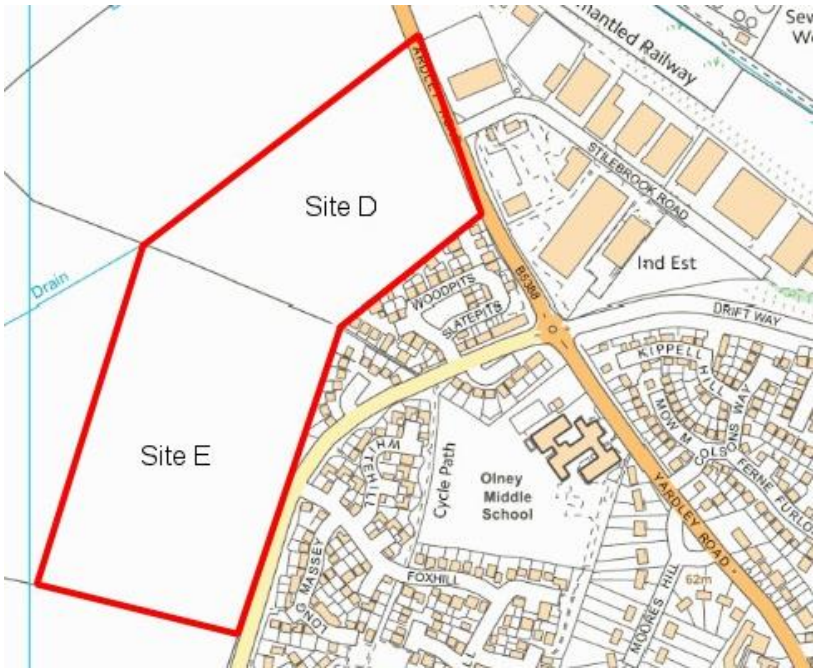
6.3.4. The Steering Group carried out its own desktop assessment of the sites in respect of access, proximity to schools, doctors, town centre, recreation space, impact from sewage works and the impact on landscape. The full Site Assessment can be found in the Supporting Evidence ref[SE15].

6.3.5. As 1,211 dwellings could, in theory, be built if all seven of the sites were developed for housing, the residents of Olney were asked in the questionnaire where they thought the new housing should be located, and also where they preferred to locate industrial and commercial development.

6.3.6. The questionnaire analysis and the community survey analysis showed that the three most favoured sites for housing were D, E and A in that order.

6.3.7. The Steering Group published for consultation a Site Allocations Plan – Consultation document[SE7]. Respondents were given the choice of two options:

6.4. **Option 1** - This was the part allocation of Sites D & E for a phased development of up to 300 homes (including 30% affordable), open space and children's play area.



6.5. **Option 2** - This was the part allocation of Sites D & E, as in Option 1, but for a smaller development of up to 250 dwellings (including 30% Affordable homes), open space, children's play area.

The remainder of the 300 homes requirement will be delivered by a 50 dwelling development on Site A (including 30% Affordable homes).



6.6. The findings from the consultation were published in December 2015 in The Olney Neighbourhood Plan - Site Selections Report[SE8]. From the Site Selections Report it can be seen that 36.92% of respondents supported Option 1, 42.65% Option 2 and 20.43% wanted neither.

6.7. The site immediately to the north of Site A has been allocated in the Neighbourhood Plan for retail use. This means that the new settlement boundary now forms the north and east boundaries of that site. The sensible extension of that boundary runs due south to encompass Site A within the new settlement boundary.

POLICY ONP2 – HOUSING LOCATION

The following sites are allocated for new residential development and are identified on the Proposals Map:

- Site A south of the Lavendon Road (B565).
- Site D west of Yardley Road (B538).
- Site E west of Aspreys.

Site F west of Aspreys (adjacent to Ousedale Academy) is to be "safeguarded" as a part of a Strategic Reserve should Sites A, D and E not come forward within the Plan period up to 2031 and deliver the required 300 new dwellings.

Any planning application for new housing development outside the revised settlement boundary, as defined on the Proposals Map, will be classified as development in the open countryside and will be refused.
All developments within 400m of the Olney Water Recycling Centre (WRC) will be required to prepare a detailed Odour Assessment to demonstrate that the site can be developed without having an adverse impact on future occupants of any premises.
All developments will be required to liaise with Anglian Water about the capacity of existing clean water and foul water networks.

POLICY ONP3 – SITE A

The boundary of Site A will be as shown on the proposals map.

The development will contain approximately 50 dwellings and the following conditions shall apply:

- 30% of the dwellings will be affordable.
- The housing density will be approximately 35 dwellings per hectare.
- The site will be brought forward in a comprehensively masterplanned approach to ensure the delivery of essential on site and off site infrastructure.
- The housing mix (in terms of size and tenure) should deliver a mixed and balanced community to meet the housing needs of Olney residents and be in accordance with Policies ONP6 (Affordable Housing) and ONP7 (Housing Type and Design).
- Parking provision shall be in accordance with Milton Keynes Council adopted parking standards.
- The development will provide on-site a Neighbourhood Play Area including a Locally Equipped Area for Play (LEAP) and an additional fenced Play Area for toddlers.
- The development shall preserve and enhance existing trees and hedges on site.
- The development will be required to make financial contributions towards any infrastructure and amenity improvements in the town as required to make the development acceptable in planning terms, is directly linked to the development and is fair and reasonably related in scale and kind to the development.

The following supporting information will be required as part of any planning application as a minimum, with the final scheme and level of supporting information agreed with MKC:

- A Flood Risk Assessment and Sustainable Urban Drainage Strategy will be required which will detail a comprehensive approach to the management of surface and ground water management on site to include, balancing ponds, swales and other sustainable drainage measures.
- A Transport Assessment and Residential Travel Plan will be required to demonstrate safe access and egress from the site to ensure highway safety. In addition, the Transport Assessment will be required to demonstrate the traffic impact on the surrounding highway network together with proposals for sustainable transport linkages to bus routes, the pedestrian footway network and cycle routes to connect to existing and new networks. These dedicated pedestrian and cycle routes will connect to existing routes in the town but also provide links to the schools, open spaces, play areas, adjoining neighbourhoods, employment areas and the town centre.
- A Landscape and Visual Impact Assessment will be required to demonstrate the potential effect and landscape impact on the Ouse Valley Landscape Character Area.
- Proposals must be informed by the findings of a program of archaeological investigation undertaken according to a written scheme of investigation as agreed by the council's archaeological adviser. Development proposals must demonstrate the archaeological remains of national importance will be remained preserved in situ. Loss of remains of less than national importance will only be considered acceptable where it is necessary to deliver public benefits that could not otherwise be delivered and that outweigh the value of the heritage assets lost. In such cases, it must be demonstrated that the layout and design of development has sought to minimise the loss of archaeological remains. Where it is felt that the merits of development justify the loss of archaeological remains that are identified as present, a suitable program of recording and publication of those remains will be required.

6.8. As the 250 dwellings planned for Sites D and E form a large and important development the Steering Group has welcomed the submission of more detailed proposals put forward by the owner's agents, and as amended following discussions. The number of homes in the Neighbourhood Plan for these two sites remains unchanged at up to 250 but the density of housing has been reduced thus taking up more of the total area. In addition, substantial areas have been allocated to planted shelter belts, a 4.0 hectare area of open space has been designated for public open space and green infrastructure, 0.25 hectares has been reserved for community facilities and the balance of Site E has been safeguarded as a strategic reserve. An indicative masterplan[SE20] of the agreed layout is included in the Supporting Evidence.

POLICY ONP4 – SITES D AND E AND ASSOCIATED OFF-SITE GREEN INFRASTRUCTURE

The boundary of sites D and E will be as shown on the proposals map.

The development will be brought forward in accordance with a comprehensive masterplan covering both sites to ensure the delivery of essential onsite and offsite infrastructure and will contain approximately 250 dwellings and the following conditions shall apply:

- 30% of the dwellings across the combined area of sites D and E will be Affordable
- The net housing density will be approximately 35 dwellings per hectare. The final masterplan will be determined in accordance with detailed design and landscape considerations.
- On the western side of Site D as shown on the proposals map, the development will provide a minimum of 4 hectares of land to provide new public open space and land for green infrastructure serving this part of the town. It will be delivered in stages to meet the Local Plan policy requirements for open space as well as integrating landscape and ecological mitigation in a comprehensive way. It will contain an area of 0.25 Hectare to be reserved for community use and delivered in conjunction with Sites D and E.
- The housing mix (in terms of size and tenure) should deliver a mixed and balanced community to meet the housing needs of Olney residents and be in accordance with Policies ONP6 (Affordable Housing) and ONP7 (Housing Type and Design).
- Parking provision shall be in accordance with Milton Keynes Council adopted parking standards.
- The development will provide on-site a Neighbourhood Play Area including a Locally Equipped Area for Play (LEAP) and an additional fenced Play Area for toddlers.
- The development shall preserve and enhance existing trees and hedges on site and provide a Wildlife Area to make a positive net gain to bio-diversity. Within the allocated area a central area of local open space shall be provided which directly links to the off-site strategic open space. In addition, a 30m wide shelter belt of indigenous trees will be planted adjacent to the reserved route for a possible future by-pass. This will be required to be planted before first occupation.
- The development will be required to make financial contributions towards any infrastructure and amenity improvements in the town as required to make the development acceptable in planning terms, is directly related to the

development and is fair and reasonably related in scale and kind to the development

The following supporting information will be required as part of any planning application as a minimum, with the final scheme and level of supporting information agreed with MKC:

- A Flood Risk Assessment and Sustainable Urban Drainage Strategy will be required which will detail a comprehensive approach to the management of surface and ground water management on site to include, balancing ponds, swales and other sustainable drainage measures.
- A Transport Assessment and Residential Travel Plan will be required to demonstrate safe access and egress from the site to ensure highway safety. In addition, the Transport Assessment will be required to demonstrate the traffic impact on the surrounding highway network together with proposals for sustainable transport linkages to bus routes, the pedestrian footway network and cycle routes to connect to existing and new networks. These dedicated pedestrian and cycle routes will connect to existing routes in the town but also provide links to the schools, open spaces, play areas, adjoining neighbourhoods, employment areas and the town centre.
- A Landscape and Visual Impact Assessment will be required to demonstrate the potential effect and landscape impact on the Ouse Valley Landscape Character Area.
- Proposals must be informed by the findings of a program of archaeological investigation undertaken according to a written scheme of investigation as agreed by the council's archaeological adviser. Development proposals must demonstrate the archaeological remains of national importance will be remained preserved in situ. Loss of remains of less than national importance will only be considered acceptable where it is necessary to deliver public benefits that could not otherwise be delivered and that outweigh the value of the heritage assets lost. In such cases, it must be demonstrated that the layout and design of development has sought to minimise the loss of archaeological remains. Where it is felt that the merits of development justify the loss of archaeological remains that are identified as present, a suitable program of recording and publication of those remains will be required.
- An ecological assessment will be required to demonstrate that the proposed development not have an effect on ecology and biodiversity assets.

POLICY ONP5 – INFILL SITES AND WINDFALL SITES

Small, well designed residential developments on infill and windfall sites within the settlement boundary which do not have a detrimental effect on the surrounding area will be supported. The impact of any proposed development

will be determined based on protecting the unique character of Olney, its heritage assets and their setting. New development should enhance the character and appearance of their locality and not have a detrimental effect on the residential amenity of surrounding properties.

6.9. **AFFORDABLE HOUSING AND THEIR ALLOCATION**:

6.9.1. The National Planning Policy Framework defines Affordable Housing as *"Social Rented, Affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable Housing should include provisions to remain at an Affordable price for future eligible households or for the subsidy to be recycled for alternative Affordable Housing provision"*

6.9.2. MKC policy requires 30% of all new housing to be Affordable. The MKC Affordable Housing Supplementary Planning Document says that of the 30%, 25% of units should be for rent and 5% for Shared Ownership/Newbuild Homebuy.

6.9.3. The responses to the Questionnaire showed that there was strong support for 30% of homes being affordable. 89% of respondents thought that some of the Affordable homes should be reserved for local people.

6.9.4. The Community Impact Housing Survey indicated that 40% of respondents wanted Affordable homes for rent and 60% wanted them to be for sale.

6.9.5. **Local connection Policy**

Affordable houses in Olney, provided by the plan, shall only be occupied by persons (and their dependants) whose housing needs are not met by the open market and:

a. who have a minimum period of 10 years permanent and continuous residence in the parish or an adjoining parish; or

b. who are not now resident in the parish or an adjoining parish but have a local connection with the parish including a period of permanent and continuous residence of 10 years or more within the last 20; or

c. who have an essential need to live close to another person who has a minimum of 10 years permanent and continuous residence in the parish or an adjoining parish, the essential need arising from proven age or medical reasons; or

d. who need to live close to their place of work in the parish or an adjoining parish.

Where such a person cannot be found, an Affordable house may then be occupied by persons (and their dependants) whose housing needs are not met by the market and:

a. who have a minimum period of five years permanent and continuous residence in the parish or an adjoining parish; or

b. who are not now resident in the parish or an adjoining parish but have a local connection with the parish including a period of permanent and continuous residence of five years or more within the last 10; or

c. who have an essential need to live close to another person who has a minimum of five years permanent and continuous residence in the parish or an adjoining parish, the essential need arising from proven age or medical reasons.

Where such a person cannot be found, Affordable homes may then be occupied by persons (and their dependants) whose housing needs are not met by the market and:

a. who have a minimum period of 10 years permanent and continuous residence in the additional adjoining parishes listed below; or

b. who are not now resident in the parish or an adjoining parish but have a local connection with the additional adjoining parishes listed below including a period of permanent and continuous residence of 10 years or more within the last 20; or

c. who have an essential need to live close to another person who has a minimum of 10 years permanent and continuous residence in the additional adjoining parishes listed below, the essential need arising from proven age or medical reasons; or

d. who need to live close to their place of work in the additional adjoining parishes listed below.

The additional adjoining parishes are: Warrington, Clifton Reynes, Tyringham and Filgrave, Emberton and Weston Underwood.

POLICY ONP6 – AFFORDABLE HOMES

In any development of 15 dwellings or more, 30% of those dwellings are required to be Affordable.

25% of all new Affordable Housing provided by the Plan will initially be subject to the Local Connection Policy, such that people with a strong local connection and whose needs are not met by the open market will be first to be offered the tenancy or shared ownership of the home

Proposals for development will need to consider local housing need and should provide a tenure mix of 10% of the dwellings being for shared-ownership (intermediate housing), and 20% for Affordable rent.

That Affordable dwellings are situated in groups of six dwellings or fewer, spread across the development.

6.10. HOUSING TYPE AND DESIGN:

6.10.1. The Housing Survey asked the community what type of homes were required. Affordable homes had the most support. After that homes for elderly downsizers, small family homes (2 bedrooms) and medium family homes (3 bedrooms) had almost equal support.

6.10.2. The Housing Survey also highlighted the case for building homes to higher energy efficiency and accessibility standards.

6.10.3. The Olney Site Allocations Plan Consultation document suggested the idea that Site A be used for smaller dwellings with a particular emphasis on sheltered and retirement homes. It noted that this would require the agreement of the landowner. Two thirds of respondents agreed with this idea. In the event the developer of the site explained that this was not commercially viable, but the market did support a requirement that new homes have an inbuilt flexibility for changing circumstances such as required by the Lifetime Homes[SE16] standards.

6.10.4. All planning applications are assessed by MKC using the New Residential Development Design Guide (SPD) and this policy continues after the Olney Neighbourhood Plan is in place.

6.10.5. The first part of this guide, Sections 1-3, is an 85 page document that covers all aspects of developing residential sites. It is a detailed document, but says on page 22, to give just one example of the comprehensive requirements, that development within the rural villages should respect the existing character of the settlement. The 76 page second part, Sections 4&5, as well as containing many detailed design requirements stresses the need for flexibility in the design of homes and says in paragraph 4.2.5 that developers are encouraged to meet 'Lifetime Homes' standards for new dwellings.

6.10.6. The Lifetime Homes Design Guide[SE16] describes the design requirements for accessible homes that will meet the differing and changing needs of households as they experience life events. It contains 16 criteria that cover, in detail, all aspects of designing a dwelling that either has factors built in, or can be easily adapted, to provide a viable dwelling for the disabled or for those with restricted mobility.

POLICY ONP7 – HOUSING TYPE AND DESIGN

1. All housing developments beyond a single unit will have a mix of housing. A minimum of 50% of the dwellings must be 1, 2 or 3 bedroom properties.
2. Developers should be encouraged to build all dwellings to the Lifetimes Homes Standard, the latest DCLG Technical Housing Standards, and to at least level B energy efficiency rating.

COMMUNICATIONS INFRASTRUCTURE:

The provision of good telecommunications is particularly important in rural areas and for the support of rural enterprise and home-working. Currently fibre optic connections are the most robust and future-proof method of delivering high performance connectivity and this should be the aim for all new developments.

POLICY ONP8 – COMMUNICATIONS INFRASTRUCTURE

Proposals which seek the expansion of electronics communication networks and high speed broadband along with improvements to connectivity will be supported where the applicant has fully explored the opportunities to erect apparatus on existing buildings, masts or other structures; where the numbers of radio and telecommunication masts are kept to a minimum consistent with the efficient operation of the network.

Applications for residential and commercial development must contain a 'Connectivity Statement' and will provide for suitable ducting to enable more than one service provider to provide a fibre connection to individual properties from connection chambers located on the public highway, or some alternative connection point available to different service providers.

7. OBJECTIVE 2

TO ENSURE THAT THERE IS SUFFICIENT LAND TO MEET FUTURE HEALTH AND COMMUNITY NEEDS

7.1. From the questionnaire responses it is apparent that there is concern that Cobb's Garden surgery is too small to cope with the increased demand that will arise from an increase in population. There are currently 8,500 patients.

7.2. There is a current document prepared by Milton Keynes Clinical Commissioning Group titled "Shaping your local healthcare". It says "*The CCG will commission a greater proportion of healthcare activity in the community and at home with a greater emphasis on prevention and self-care for all of our patients*". This would require more facilities to be accommodated at the existing, or any new Health Centre.

7.3. Using figures obtained from the NHS, which uses the area required for each doctor as a standard, the current surgery is at the present time about half the size it should be. A calculation[SE19] which takes into account the probable long term population of Olney and the move to more care in the community produces a figure of 1,350 sq m for the area of land that would be required for a new health centre and car park.

7.4. The team at Cobbs Garden has stated that they favour a site for a new Health Centre on the land adjacent to Austen Avenue (Site H) alongside the youth club. This grassed area measures approximately 2,500 sq m. It is on the level and relatively close to the town centre when compared with other sites that could be allocated. The land is currently in public ownership.

POLICY ONP9 – HEALTH

The boundary of Site H will be as shown in the Proposals Map.

Planning permission will only be granted for development on Site H which meets the health, social care and community purposes of the town.

Applicants will be required to demonstrate that they have liaised with Anglian Water about establishing a safe distance from the pumping station to minimise noise disturbance and any effect on water infrastructure.

POLICY ONP10 – ASSETS OF COMMUNITY VALUE

Proposals that will result in either the net loss of a Registered Asset of Community Value or in significant harm to a Registered Asset of Community Value will be resisted.

8. OBJECTIVE 3

TO ENSURE THAT THERE IS SUFFICIENT LAND AVAILABLE TO MEET FUTURE EDUCATIONAL NEEDS

8.1. MKC project an average pupil yield of 5.8 children per year group, for every new 100 homes. 300 new homes would yield an average of about 18 additional pupils per year group. Local authorities have a statutory duty to secure sufficient school places for all children resident in their area.

8.2. Schools

8.2.1. Ousedale Academy.

The Olney campus of Ousedale Academy is currently taking a proportion of pupils from outside the catchment area. If the student intake was confined to those within the catchment area, which will eventually include 300 additional homes, there would be sufficient capacity within the existing building. Should it prove necessary in the longer term to expand the school, the open area of ground within the boundary fence to the west of the current building is available.

8.2.2. Olney Middle School.

There is physical room for expansion on the existing site to accommodate the additional demand generated by the scale of development in the plan.

8.2.3. Olney Infant Academy.

There is physical room for expansion on the existing site to accommodate the additional demand generated by the scale of development in the plan.

8.2.4. Early Years Provision

There is currently insufficient capacity in Olney to meet pre-school demand, a situation that will be exacerbated by the government policy to fund 30 hours of childcare for all 2 year olds.

8.3. **CONCLUSION:**

There is sufficient capacity, or room for expansion, at all three of the Olney schools. Therefore, the Neighbourhood Plan does not need to allocate any further sites for educational purposes to meet demand created by the level of housing in the Plan.

The town council will consider as part of the town council's deliberations whether additional early years provision can be delivered through developer contributions.

9. OBJECTIVE 4

TO ALLOCATE LAND FOR EMPLOYMENT USE AND SAFEGUARD THE EXISTING STILEBROOK ROAD INDUSTRIAL ESTATE

9.1. The responses to the 2014 questionnaire showed strong support for more local employment, and good support for more accommodation for start-up businesses and the opportunities to work in Olney.

9.2. A letter was sent to 202 businesses in Olney with a range of questions designed to get their views on what the business sector required in the future.

9.3. Question 4 on the original questionnaire asked "Which sites do you consider suitable for other development such as industrial, commercial and retail?" The responses were very strongly in favour of Site B, west of Warrington Road and Site C east of Yardley Road.

9.4. In the Steering Group's Site Allocations Plan - Consultation Document, the preferred option for employment use proposed was Site C, with Site B reserved for future consideration for employment use. The responses endorsed this proposal.

9.5. It is noted that the eastern half of Site C has been granted outline planning permission for the construction of 33 dwellings.

9.6. Discussions have been held with the agents for the owner of Site B on the Warrington Road. Although their plans are only in the preliminary stage, they are considering commercial, office, care home and hotel facilities on this site. If realised, this type of development would give more local employment, something that was strongly supported in the questionnaire responses.

9.7. Outline planning consent has been granted on Site C for 66 dwellings in two phases. However, there are unresolved issues related to odour impact from the adjacent sewerage works. The Neighbourhood Plan does not support residential uses on this site on the grounds that it would not constitute sustainable development on environmental and residential amenity grounds.

9.8. It is noted that Site B and Site C are both in close proximity to a Scheduled Ancient Monument with a high likelihood of nationally important archaeological remains being encountered.

POLICY ONP11 – SAFEGUARDED EMPLOYMENT LAND

The Neighbourhood Plan confirms that the existing industrial estate and office park located on land between Yardley Road and Warrington Road, known as Site

S, will be safeguarded for employment-related Use Classes B1 (business), B2 (industrial) and B8 (storage and distribution). Any planning application for non-employment related uses will be refused.

POLICY ONP12 – NEW EMPLOYMENT LAND

Site B as shown on the Proposals Map is allocated for an employment led mixed use development. Proposals for B1 (business), B2 (industrial) and B8 (storage and distribution) will be allowed in conjunction with complimentary C1 (Hotel), C2 (Residential Institutions) and D1 (Non-residential Institutions). Applications for C3 (residential) will be refused consent. Development proposals which contain a mix of uses will be acceptable, in principle, subject to a demonstration that B1, B2 and B8 will be the dominant uses on site and subject to detailed design and assessment of all other planning policies.

Site C as shown on the Proposals Map is allocated for employment uses falling within classes B1 (business), B2 (industrial) and B8 (storage and distribution) of the use classes order. Alternative uses will be refused consent. Development proposals which may contain a mix of B1, B2 and B8 uses will be acceptable, in principle, subject to detailed design and assessment of all other planning policies.

The following supporting information will be required as part of any planning application as a minimum, with the final scheme and level of supporting information agreed with MKC:

a) The development shall be well-designed, predominantly two storeys in height, and should include suitable on-site landscaping.

b) The development shall provide off-street car parking and the provision shall be in accordance with Milton Keynes Council adopted parking standards.

c) The development shall preserve and enhance existing trees and hedges on site, and provide a Wildlife Area to make a positive net gain to bio-diversity.

d) The development shall provide a new belt of structural planting to provide a new defined edge to the settlement boundary.

e) A Flood Risk Assessment and Sustainable Urban Drainage Strategy will be required which will detail a comprehensive approach to the management of surface and ground water management on site to include, balancing ponds, swales and other sustainable drainage measures.

f) A Transport Assessment and Workplace Travel Plan will be required to demonstrate safe access and egress from the site to ensure highway safety. In addition, the Transport Assessment will be required to demonstrate the traffic impact on the surrounding highway network together with proposals for sustainable transport linkages to bus routes, pedestrian footway network and cycle routes to connect to existing and new networks in the town.

g) A Landscape and Visual Impact Assessment will be required to demonstrate that the potential effect and landscape impact on the Ouse Valley Landscape Character Area.

h) Development proposals should be informed by results of a programme of archaeological investigation undertaken to according to a written scheme of the investigation agreed in writing with the council's archaeological advisor. Where there are shown to be present, remains of national importance must be preserved in situ through the careful design and development, including careful use of layout and construction methods. Development resulting in loss of remains of regional or local interest will not be permitted unless it is shown that development proposals have sought to minimise the loss of remains and that areas of better preserved remains have been favoured for retention. Development proposals will be expected to provide mitigation of loss of archaeological remains through the provision of interpretation of the site's archaeological interest to increase public awareness and enjoyment of the area's past.

i) An Ecological Assessment will be required to demonstrate that the proposed development will not have an effect on ecology and biodiversity assets.

10. OBJECTIVE 5

TO ALLOCATE LAND FOR RETAIL USE

10.1. Site R has been the subject of a planning application for a local supermarket and petrol filling station. The application was refused, against officer advice, for being in open countryside and the impact it would have on the town centre.

10.2. The site had previously been granted planning consent for a petrol filling station on the east end of the site.

10.3. OTC supported the application for a supermarket, as did a majority of respondents to a community engagement consultation[SE17].

10.4. As part of that planning application, MKC commissioned from Carter Jonas a study[SE18] of the impact the supermarket would have on the Town Centre. The conclusions to this study include the following clauses:

> "*We recognise the potential need for a main food shopping facility for Olney as highlighted by significant level of expenditure drawn to the main food shopping centres in neighbouring centres. While the proposed foodstore is not of a scale that will compete with the larger superstores in Milton Keynes and Wellingborough, it nonetheless has the potential to support the local shopping needs of Olney and its rural catchment.*
>
> *The provision of a foodstore and petrol filling station to serve Olney's catchment will reduce travel distances for residences in the catchment; thereby supporting the NPPF's principle aim for sustainable economic development.*
>
> *We also conclude that the scale and type of out of town floorspace currently proposed by the applicant will not have a 'significant adverse impact' on the vitality and viability of Olney Town Centre. While the level of trade diversion from the existing Co-op store in Olney Town Centre is high, we do not consider it will have a 'significant adverse impact' on the long term viability of the store."*

10.5. A 2014 guide entitled High Street Performance and Evolution was produced by the University of Southampton and funded by the Future High Streets Forum and the Economic and Social Research Council and is designed to help those developing local policies and strategies.

10.6. The study seems to be aimed at larger towns than Olney but, in the section on out of town centres, it says "*Clearly out of town developments continue to pose a threat to nearby centres. However, case study evidence shows that edge of town developments, if designed and managed appropriately, can complement the town centre retail and service offer*".

10.7. Taking into account local support and evidence, the Steering Group consider that the addition of a supermarket will add to the local retail offer and not have a significant impact upon the Town Centre.

POLICY ONP13 – RETAIL

The boundary of Site R will be as shown in the Proposals Map

Planning permission will be granted only for retail development on Site R including for a food store (Use Class A1) and possibly a petrol filling station.

Planning permission will be granted only for development on Site R where it can be demonstrated that it will not have a significant adverse impact on the vitality and viability of the town centre.

Developer contributions will be required to fund any improvements to the Town Centre in order to mitigate any impact on the town centre retail offering which is required to make the development acceptable in planning terms, is directly related to the development and is fair and reasonably related in scale and kind to the development.

The following supporting information will be required as part of any planning application as a minimum, with the final scheme and level of supporting information agreed with MKC:

- Development proposals should be informed by results of a programme of archaeological investigation undertaken to according to a written scheme of the investigation agreed in writing with the council's archaeological advisor. Where there are shown to be present, remains of national importance must be preserved in situ through the careful design and development, including careful use of layout and construction methods. Development resulting in loss of remains of regional or local interest will not be permitted unless it is shown that development proposals have sought to minimise the loss of remains and that areas of better preserved remains have been favoured for retention. Development proposals will be expected to provide mitigation of loss of archaeological remains through the provision of interpretation of the site's archaeological interest to increase public awareness and enjoyment of the area's past.
- A Flood Risk Assessment and Sustainable Urban Drainage Strategy will be required which will detail a comprehensive approach to the management of surface and ground water management on site to include, balancing ponds, swales and other sustainable drainage measures.
- A Transport Assessment and Travel Plan will be required to demonstrate safe access and egress from the site to ensure highway safety. In addition, the Transport Assessment will be required to demonstrate the traffic impact on the surrounding highway network together with proposals for sustainable

transport linkages to bus routes, the pedestrian footway network and cycle routes to connect to existing and new networks. These dedicated pedestrian and cycle routes will connect to existing routes in the town but also provide links to the schools, open spaces, play areas, adjoining neighbourhoods, employment areas and the town centre.

- A Landscape and Visual Impact Assessment will be required to demonstrate the potential effect and landscape impact on the Ouse Valley Landscape Character Area.
- An ecological assessment will be required to demonstrate that the proposed development not have an effect on ecology and biodiversity assets.

11. OBJECTIVE 6

TO PROTECT AND ENHANCE THE CHARACTER, APPEARANCE, VITALITY, VIABILITY AND SIGNIFICANCE OF THE HISTORIC TOWN CENTRE AND CONSERVATION AREA, AND OTHER HERITAGE ASSETS IN TOWN

11.1. Existing MKC policies cover this subject. Policy HE6 covers the Conservation Area and its objectives are:

"To preserve or enhance all the aspects of character or appearance which contribute to the special interest of a designated Conservation Area.

To avoid inappropriate development in Conservation Areas following the grant of outline planning permission.

To avoid the erosion of the special interest of a Conservation Area through the inappropriate loss of historic fabric."

11.2. Policies TC1 and TC2, of the 2005 Local Plan, relate to the Town Centre, and its objectives are:

"To define the role of Olney Town Centre.

To improve the attractiveness of the town centre.

The priorities listed under TC2 for improving the Town Centre are:

Enhancement of the Market Place.

Parking improvements.

Removal of through HGV traffic.

Improving pedestrian and cycle access and public transport access."

11.3. The plan endorses all existing relevant policies and will continue to monitor their application.

11.4. Improvements will be made to various public amenities.

12. OBJECTIVE 7

TO PROTECT, ENHANCE AND PROVIDE ADDITIONAL OPEN SPACES, COMMUNITY FACILITIES AND SPORTS AND RECREATION FACILITIES, BOTH WITHIN THE TOWN AND BETWEEN THE TOWN AND THE RIVER OUSE

12.1. The questionnaire responses showed that the majority view was that the land set aside for playing fields was about right. The recommended standard in the Local Plan for playing fields is expressed as 1.5 hectares for every 1,000 people. If it is assumed that the population of Olney will be approaching 9,000 by 2031, the requirement for playing fields would be 13.5 hectares. The current area of playing fields in the town is 25.2 hectares.

12.2. There was also agreement that the land set aside for allotments is about right. The area of the allotments is 3 hectares and in Appendix L3 of MKC Local Plan of 2005 states there is a recommended plot ratio of 0.25 ha per 1,000 head of population. The National Allotment Association guidance is 20 plots per 1,000 households. A figure of 3,000 households would, on this basis, require 60 allotments. The current total number of allotments is 170.

12.3. There was overwhelming support for the view that the Ouse valley around Olney should be protected.

12.4. There is a view that there are not enough facilities in the town for the 13 to 18 age group.

POLICY ONP14 – OPEN SPACES

Proposals that result in the loss of the open spaces shown on the Proposals Map or result in the loss of existing community, allotment, sports or recreation facilities, will not be approved

Proposals which provide for additional public open space, sports facilities at each of the residential site allocations and at the Olney Infant Academy, Olney Middle School and Ousedale Academy, and which meet the requirements of the school and enable use by the wider community, will be encouraged.

13. OBJECTIVE 8

TO IMPROVE PARKING, ACCESSIBILITY, PEDESTRIAN AND CYCLING ROUTES THROUGHOUT THE TOWN

13.1. The community questionnaire asked about changes to the times allowed for parking. The preferences expressed in the responses were:

- Parking at the Market Place should stay the same at 3 hours free parking, but there was some support to reduce this to 2 hours.
- 235 respondents wanted a parking time restriction at Fountain Court although 325 did not, and 249 respondents wanted a time restriction for the Cattle Market Car Park but 301 did not.
- 76% of respondents did not want parking restrictions extended further along the High Street.
- There was significant support in the comments made in the responses for more cycle racks in the town centre.

13.2. From the written comments parking in general is seen as a major issue with a particular concern about sports parking at weekends. Despite the town's parking problems, the East Street car park is underutilised during weekdays.

13.3. However, as there are no major solutions to the problem, parking can only be improved by taking a number of minor actions to maximise the utilisation of the existing areas.

13.4. The largest numerical response to any question in the questionnaire was that asking how the town could be made more cycle friendly.

POLICY ONP15 – PARKING AND ACCESSIBILITY

All new developments on allocated sites will be planned with integrated cycle and pedestrian routes which will integrate with and expand existing networks.

Developer contributions will be sought towards a wider package of sustainable transport initiatives for the town which are required to make any development acceptable in planning terms, are directly related to the development and is fair and reasonably related in scale and kind to the development

14. OBJECTIVE 9

TO REDUCE TRAFFIC PROBLEMS

14.1. There were many comments in the responses to the questionnaire about traffic congestion and the prospect of a bypass. MKC's existing policies are set out in two documents. Firstly, the 2005 MKC Local Plan policy TC2 lists the removal of HGV traffic as a priority for improving the town centre. Secondly, policy HTo21/HTo22 in the Local Transport Plan 3 - 2011 to 2031 (LTP3) "A Transport Vision and Strategy for Milton Keynes" states:

"*The council supports, in principle, the Olney and Bletchley Southern bypasses subject to design, feasibility (including affordability), public consultation and funding. These two new roads projects will ease traffic and air pollution in Olney and Bletchley, as well as easing traffic accessing Central Milton Keynes on arterial routes*."

14.2. Also, policy HTo5 states:

"*Of particular note is Olney, which has poor air quality, partially caused by goods vehicles. A bypass is supported by the council, and will be subject to further feasibility testing and community engagement on all options considered. Before then, the council will work closely with the Highways Agency to find ways to route heavy vehicles away from Olney and other rural communities onto alternative routes which are designed to carry HGVs*".

14.3. The town council will continue to engage with Milton Keynes council and SEMLEP to bring forward plans for a bypass.

POLICY ONP16 – OLNEY BYPASS

Planning Permission will be refused for development that would prejudice the construction of the following roads:

- Olney Bypass (western option).
- Olney Bypass (eastern option).

15. OBJECTIVE 10

TO USE FUNDS ARISING FROM DEVELOPER CONTRIBUTIONS FOR IMPROVEMENTS TO FACILITIES AND INFRASTRUCTURE

15.1. All developments of 10 or more dwellings, and industrial, commercial and retail developments are required to make financial contributions for infrastructure and facility improvements across the borough of Milton Keynes. This is done through formal Section 106 Agreements with developers.

15.2. For housing, this money is released in three stages during construction at the 25%, 50% and 75% stages of completion. For 300 homes that part of the total money raised that is allocated for use in Olney will release significant funding for infrastructure development and other improvements.

15.3. In order to mitigate any impact on the town centre arising from development, developer contributions will be required to fund town centre improvements.

16. IMPLEMENTATION AND MONITORING

16.1. Once the Neighbourhood Plan has been officially adopted by MKC, it will be used in two ways:

16.2. Policies ONP1 to ONP8, regarding Housing, Health, Education, Employment and Retail, will be used when determining planning applications to ensure compliance with those policies.

16.3. Policies ONP9 to ONP16 which cover the town in general, the open spaces, parking, and traffic contain several statements of intent that will lead to actions being taken. The original questionnaire produced a number of suggestions and statistics on what residents wanted and other proposals have come from the various discussions that have taken place. Taking this into account, OTC will review, decide and implement actions to realise as far as is possible all the objectives of the policies. The speed of implementation will of course depend on funding both from existing sources and from the monies arising from Section 106 agreements as detailed under Objective 10 above. The Town Council will provide regular updates on the progress being made.

16.4. To ensure that the Neighbourhood Plan is actively monitored between its adoption and the end date of 2031, and to take into account possible changes in national or local planning policies, the following review periods are built into the Plan. At each Annual Town Council Meeting, a detailed report will be presented which will report on progress of the Plan in the previous year, detailing the likely implementations and impact of the Plan for the forthcoming year. Every five years a thorough review of the plan will take place, to include consideration of preparing successor Neighbourhood Plans to reflect changed circumstances.

OLNEY NEIGHBOURHOOD PLAN - 2016 TO 2031

SUPPORTING EVIDENCE – LIST OF REFERENCED DOCUMENTS

All documents can be examined at OTC Office or accessed on line

ITEM	DESCRIPTION	LOCATION
SE1	Neighbourhood Plan Area Designation	http://olneyplan.com/the-plan/stage-1/
SE2	Questionnaire issued Oct 2014	http://olneyplan.com/communityquestionnaire/
SE3	Responses to questionnaire	http://olneyplan.com/evidence/questionnaire-report/
SE4	Housing Survey	http://olneyplan.com/evidence/housing-needs-survey-report/
SE5	Community Questionnaire analysis	http://olneyplan.files.wordpress.com/2014/02/questionnaire-report.pdf
SE6	Phonebox articles	http://olneyplan.com/phonebox-articles/
SE7	Steering Group's Site Allocations Consultation	http://olneyplan.com/siteallocations/
SE8	Site Selection Report	http://olneyplan.com/site-selections-report/
SE9	Record of meetings	http://olneyplan.com/steering-group/meetings/
SE10	MKC Core Strategy	www.milton-keynes.gov.uk/planning-and-building/planning-policy
SE11	MKC Local Plan	www.milton-keynes.gov.uk/planning-and-building/planning-policy
SE12	MKC Housing letter dated 13/8/2014	http://olneyplan.com/2014-08-13-mkc-housing-numbers/
SE13	MKC Housing e-mail dated 18/2/2015	http://olneyplan.com/2015-02-18-mkc-housing-numbers/
SE14	MKC Site Allocations Plan	http://olneyplan.com/site-allocations-plan-emerging-preferred-options-consultation/
SE15	Site Desktop Assessment	http://olneyplan.com/site-assessments-3/
SE16	Lifetime Homes design guide	http://www.lifetimehomes.org.uk/index.php
SE17	Community Engagement Report	http://olneyplan.com/00201774/
SE18	Carter Jonas report	http://olneyplan.com/carterjonasretail/
SE19	Site D&E indicative masterplan	http://olneyplan.files.wordpress.com/2014/02/sitesde-masterplan.pdf

John Slater Planning Ltd

Olney Neighbourhood Plan 2016-31

Submission Version

A Report to Milton Keynes Council on the Examination of the Olney Neighbourhood Plan

John Slater BA (Hons), DMS, MRTPI

John Slater Planning Ltd

[redacted]

25th April 2017

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Introduction

Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside Milton Keynes' Core Strategy and the saved policies of the 2005 Local Plan. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

The neighbourhood plan making process has been led by Olney Town Council. A Steering Group was appointed to undertake the plan preparation made up of an equal mix of Parish Councillors and lay members. Olney Town Council is a "qualifying body" under the Neighbourhood Planning legislation.

This report is the outcome of my examination of the Submission Version of the Olney Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by Milton Keynes Council, the Local Planning Authority for the neighbourhood plan area.

The Examiner's Role

I was formally appointed by Milton Keynes Council in February 2017, with the agreement of Olney Town Council, to conduct this examination. My role is known as an Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service which is administered by the Royal Institute of Chartered Surveyors (RICS)

In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 38 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Milton Keynes Council, and Olney Town Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the plan should proceed to referendum on the basis that it meets all the legal requirements.
- That the plan should proceed to referendum if modified
- That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

Furthermore, if I am to conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of area covered by the Olney Neighbourhood Plan area.

In examining the Plan, the Independent Examiner is expected to address the following questions

a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as "excluded development" and also that it must not cover more than one Neighbourhood Plan area.
c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

I am able to confirm that the Plan, if amended in line with my recommendations, does relate to the development and use of land, covering the area designated by Milton Keynes Council, for the Olney Neighbourhood Plan on 22nd April 2014.

I can also confirm that it does specify the period over which the plan has effect namely the period up to 2031.

I can confirm that the plan does not cover any "excluded development''.

There are no other neighbourhood plans covering the area covered by the Plan designation.

Olney Town Council as a parish council is a qualifying body under the terms of the legislation.

The Examination Process

The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.

I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

I am satisfied that I am in a position to properly examine the plan without the need for a hearing. No parties have requested a hearing.

I carried out an unaccompanied visit to Olney and the surrounding area on both 10th and 11th April 2017 to familiarise myself with the town and the allocation sites in particular.

The Consultation Process

Once Olney Town Council decided to produce a plan in 2013, it set up a steering group which has led the plan making exercise. Through the plan period, a series of meetings were held with the representatives of various site owners. In October 2014, a neighbourhood plan questionnaire was distributed to all Olney residents and pop–in sessions were held at the Olney Centre. There were 640 responses to the questionnaire. In 2015, meetings took place with the Milton Keynes Council planners, adjacent parish councils, local schools and Statutory Undertakers. A separate business survey was held in the early August 2015, followed up by the distribution of a Site Allocation Consultation Document, which was sent to all households in the town.

All this activity led to the publication of the Pre-Submission Consultation version of the plan, which is known as the Regulation 14 Consultation. This ran from 4 April 2016 to 16 May 2016. A total of 28 responses were received from local residents, business owners, landowners and other stakeholders. I am satisfied that there has been more than adequate public engagement involved in the preparation of this plan and that the comments from the residents and other key stakeholders have fundamentally shaped the choice of sites that have underpinned the final version of this plan.

Regulation 16 Consultation

I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over a 6-week period between 25th January 2017 and 8th March 2017. This consultation was organised by the Milton Keynes Council, prior to it being passed to me for its examination. That stage is known as the Regulation 16 Consultation.

In total 33 individual responses were received. Responses have come from Anglian Water, Bucks Fire and Rescue, Historic England, Natural England and Newport Pagnell Town Council and Emberton Parish Council. In addition, I have received submissions on behalf of 8 landowners around the town and also 4 letters from local residents. I have also received 15 letters which are either a pro forma or based on a pro forma issued by an organisation entitled English Regional Transport Association which is a campaigning organisation looking to restore various closed missing transport links and who are campaigning for the re-opening of the Northampton to Bedford Rail Link.

I will refer to the representations where it is relevant to my considerations and conclusions in respect of specific policies or the plan as a whole.

The Basic Conditions

The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of "soundness". The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

The six questions which constitute the basic conditions test seek to establish that the Neighbourhood Plan: -

- Has had regard to the national policies and advice contained in the guidance issued by the Secretary of State and it is appropriate to make the Plan?

- Will the making of the Plan contribute to the achievement of sustainable development?

- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?

- The making of the Plan does not breach or is otherwise incompatible with EU obligations or human rights legislation?

- Whether prescribed conditions are met and prescribed matters have been complied with?

- Whether the making of the Plan will have a significant effect upon a European site or a European offshore marine site, either alone or in combination with other plans and projects?

Compliance with the Development Plan

To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Milton Keynes Core Strategy adopted in 2013 and the saved policies of the Milton Keynes Local Plan adopted in December 2005. The parish of Olney is identified as part of the rural area and the town is one of three key settlements which are expected to provide some limited development. The rural areas are expected to contribute 1760 dwellings over the Core Strategy Plan period. Work is underway on the preparation of a new Local Plan – Plan MK. However, this is at a relatively early stage in its preparation and is what is known as *emerging policy*, compliance with which is not a matter for the basic conditions considerations.

I have carefully reviewed the policies in both adopted documents and have found no strategic policies in either the Core Strategy or the saved policies found in the older Local Plan which are in any way undermined or compromised by the policies in this Neighbourhood Plan and this element of basic condition is met.

Compliance with European and Human Rights Legislation

The Town Council requested the Milton Keynes Council to screen whether the Olney Neighbourhood Development Plan should be the subject of a Strategic Environmental Assessment (SEA) as required by EU Directive 2001/42/EC which is enshrined into UK law by the "Environmental Assessment of Plans and Programmes Regulations 2004".

Milton Keynes Council confirmed that an SEA would be required following consultation with Historic England. This Environmental Report was produced at the conclusion of the plan making process and was published in December 2016. As part of the SEA Screening report, the Local Planning Authority also screened the neighbourhood plan under the Habitat Regulations and concluded that the Plan in itself would be unlikely to have any significant effects on European protected sites, namely the Ouse- Washes SPA/SAC, Portsholme SAC and the Upper Nene Valley Gravel Pits, beyond the levels of development established by the Milton Keynes

Core Strategy and accordingly a separate Appropriate Assessment would not be required. I am satisfied that the European legislative requirements have been met and this meets another of the basic conditions.

The Neighbourhood Plan: An Overview

This is a well-structured and well written, clear and concise neighbourhood plan. Olney Town Council are to be commended on its decision to grasp the opportunity that neighbourhood planning has presented and has taken the initiative to guide the planning of the new development which the town will be facing, directing it to its preferred locations. It has taken a strong and realistic position regarding overall housing numbers and this will ensure a supply of affordable homes that the town requires.

I am pleased to note that the Olney plan has not made the mistake of some other neighbourhood plans and ventured outside the sphere of policies which deal with the "use and development of land". It definitely is a planning document which will be capable of guiding development management decisions over the next decade.

I recognise that there has been strong engagement with landowners as well as the town's key stakeholders. I am more than satisfied that residents of the town have played a full part in selecting the preferred locations for new development. I consider that these allocations are capable of delivering the number of houses and will be the type and quality that the town aspires to.

The highest number of representations received at Regulation 16 stage have been prompted by the activities of the transport pressure group, known as the English Regional Transport Association and they object to the allocation of five sites, Sites A, B, C, S and R, as they argue that the development would prevent the reintroduction of a railway line. My view is that it would be inappropriate for a neighbourhood plan to blight development land on the edge of a market town on the grounds that at some stage in the future, a new railway line could possibly be built. In any case I am required to restrict any modifications I make to the plan to those required to meet the basic conditions as set out in the neighbourhood plan legislation. I am at a loss to find a credible reason to modify the plan based on protecting a route that has no official status, does not appear to be promoted by any rail company or transport planning body, which has no funding or any reasonable timescale for its implementation. The identification and protection of any route would be a strategic decision rather than one that can be dealt with by an individual neighbourhood plan.

The one aspect of the plan I do have real concerns about, relates to the aspirations for developer contributions to be sought from development to fund various projects. These are matters that I have had cause to raise in respect of other neighbourhood plan examinations I have conducted for Milton Keynes Council. The issue stems from the decision taken by Milton Keynes Council not to pursue developer contributions through the payment of the Community Infrastructure Levy, where 25% of any contribution from applicable development taking place in the town automatically would be paid to the town council (if a neighbourhood plan is made – 15% if there is no neighbourhood plan) and instead chooses to rely upon Section 106 payments. The rules regarding financial contributions from planning obligations have significantly tightened over the last seven years. My specific reservations are that the secondary legislation now requires that for a financial contribution via a planning obligation to be used as a reason to approve the application, it must pass **all** the test set out in paragraph 204 of the NPPF, which is also given statutory weight through Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). This requires that the contribution must be: -

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

In addition, Regulation 123 of the Community Infrastructure Levy Regulations 2010 limits the number of pooled contribution to five contributions per scheme or type of infrastructure.

However, that choice is a matter for the Local Planning Authority to take a view on but in the meantime, the ability to draw upon pooled funding through Section 106 Agreements is limited.

I have had to make recommendations for the modification of a number of policies which will restrict the basis on which planning contributions can be sought.

The Neighbourhood Development Policy

Policy ONP1 - Housing Numbers

In my view, the neighbourhood plan has established a strong position regarding housing numbers and it is clear that it has worked closely with Milton Keynes Council but has also come to a housing number that it is comfortable with. It has recognised that if the town is to achieve the levels of affordable housing required to meet local housing need, as evidenced by the Housing Survey carried out by Community Impact Bucks, on behalf of the Town Council in March 2015, then it is necessary to allocate a commensurate amount of land for new market housing. The results of the

consultations reveal that there is a public support for this level of housing to be built over the plan period. The general distribution of the housing allocations is divided between three sites which have been chosen on the basis of a systematic analysis of development options, the subject of a town wide consultation on the Site Allocation Plan conducted in August 2015. I do not need to recommend any modifications to this policy. I have had regard to Gladman Developments Ltd.'s representation that the number should be a minimum figure but the strategic policy which this plan needs to be in general conformity with, does not relate to figures which are quoted as a minimum figure but is expressed as a target figure.

Policy 0NP2 – Housing

Gladman Development Ltd oppose the use of settlement boundaries as they claim their imposition conflicts with the delivery of sustainable development, one of the basic conditions relating to general conformity to Secretary of State advice. I do not agree with that view especially as I have concluded that the Plan aims to properly address Olney's housing need.

The selection of these three sites was informed by a comparison of the respective constraints and opportunities of nine sites. I consider the three allocations to be logical areas for expansion of Olney, having regard to the current pattern of development. It is also the option that enjoyed the highest level of support.

My only minor issue relates to the drafting of the policy. One of the requirements of a development plan is that it offers certainty to decision makers. The reference to a preference for the development sites in the wording, could be given greater clarity by adopting the alternative wording that the sites are *allocated* rather than *preferred*.

I consider that identifying Site F as a reserve site to be a sensible approach to ensure the delivery of this total number of houses over the 15-year plan period allowing the town to meet its housing needs. I note the Reg 16 representations of the site owners that there is insufficient flexibility in the way the policy is worded relating to future changes in circumstances. I believe that there will be a role for the local planning authority, to work with Olney Town Council in determining if and when consideration needs to be given to bringing forward Site F within the plan period. My view is that this should be done as part of the review of the plan, which paragraph 16.4 proposes should take place every five years.

I note that the policy proposes a 400 metre zone measured from the Olney Water Recycling Centre within which the impact of odour need to be assessed. This could affect the eastern side of Site D and the western corner of Site A. I saw that there is already a significant amount of residential development within that zone and I am satisfied that there is unlikely to be a major constraint on development.

Recommendation

Delete “preferred” and insert” “allocated”

Policy ONP3– Site A

I note that the policy is worded making reference to the site accommodating *up to 50 dwellings*. I also see from the 2015 Site Selection Consultation that the approximate capacity was indicated to be 60 new homes. I believe in order to achieve the objective set by Policy ONP1 that housing policies should not set maximum figures as to how much development each should provide. This could lead to a situation whereby the total number of homes needed may not be reached. I am particularly conscious that the housing needs report indicates requirements for smaller units, which is reflected in Policy ONP9. For example, a development of 100% one and two bed development would be a very different development than one that had 50% of the houses being 4 and 5 bed dwellings. Paragraph 58 of the NPPF states that developers should seek to optimise the potential of the site to accommodate development.

One option opened to me would be to recommend the modification to provide *at leas*t 50 dwellings but that could lead to a substantially higher level of development than that which the public thought they were supporting. I propose to offer some flexibility to allow the appropriate scheme to emerge, once it is known the mix of housing types and sizes of units by referring to *approximately* 50 dwellings. I also consider that the setting an exact housing density in the policy to be too prescriptive and again allowing variations in the size of dwellings to emerge could be undermined by too rigid an approach. Again, this point can be covered by the use of *approximately*.

I have noted that the developers who have an option on this land have also raised concerns regarding the density being quoted as being too high. I believe that the added flexibility can mean that there should not be an inherent conflict in terms of housing numbers and density for this edge of town location. The plan proposes that on site open space and play facilities should be provided contrary to the arrangements set down in an outline consent on the site that currently exists. I do not consider that it is necessary for me to modify that proposed policy to meet the basic conditions test and this is a matter that can be established by local determination. The existence of a planning consent is a matter of fact but there is no guarantee that the particular consent will be implemented and the existence of a neighbourhood plan policy would be a material consideration for any future planning application. If the existing consent is implemented then the policy will not be relevant unless it affects matters that are covered by reserved matters. I do not support the objection to the SUDS requirements as it allows the use of “other sustainable drainage measures”.

I do have concerns regarding the final criterion within the policy relating to infrastructure and amenity improvements in the town. I propose to require that such financial contributions are only sought where it can be shown that the contribution is necessary to make the development acceptable in planning terms, is directly related to the development and is fairly and reasonably related in scale and kind to the development. That is the legal basis for seeking such obligations when deciding to grant planning permission.

The requirement for an applicant to have to agree what information should accompany a planning application with both Olney Town Council and the local planning authority, goes beyond the expectations what a statutory consultee should expect. The LPA could choose to consult the town council on what information it would expect but it cannot be a development plan requirement.

Anglian Water has referred to sewers crossing this and a number of other allocation sites. Whilst these will have to be taken into consideration in terms of site layout it is not, in my view, a matter that needs to be referred to in terms of development plan policy.

Historic England has pointed out that the requirements in this policy and Policy ONP 4 does not follow the approach set out in the NPPF and I propose to follow their advice and utilise the wording as they have suggested.

Recommendations

Replace “up to” with “approximately”

In second criterion insert “approximately” before “35”

In final criterion insert “any” before “infrastructure” and replace “under Policy ONP 18” with “to make the development acceptable in planning terms, is directly related to the development and is fair and reasonably related in scale and kind to the development”

At the end of the third paragraph delete “and OTC”

Replace final bullet point with “Proposals must be informed by the findings of a program of archaeological investigation undertaken according to a written scheme of investigation as agreed by the council’s archaeological adviser. Development proposals must demonstrate the archaeological remains of national importance will be remained preserved in situ. Loss of remains of less than national importance will only be considered acceptable where it is necessary to deliver public benefits that

could not otherwise be delivered and that outweigh the value of the heritage assets lost. In such cases, it must be demonstrated that the layout and design of development has sought to minimise the loss of archaeological remains. Where it is felt that the merits of development justify the loss of archaeological remains that are identified as present, a suitable program of recording and publication of those remains will be required"

Policy 0NP4 – Site D and E and associated offsite green infrastructure

Similar comments relate to these two sites as previously referred to in respect to Site A in terms of the way the policies are drafted. Whilst the plan treats the two sites as separate allocations, it is a requirement of the policy for them to be treated as a single development in terms of master planning. I support that approach and therefore propose to make that requirement more explicit by moving the third criteria to form part of the text of the main policy wording.

The developers of the site have suggested the remainder of what had been the larger Site E, as per the Site Allocation Consultation, should be allocated as a reserve site rather than Site F and suggests that the settlement boundary should be extended out accordingly. I do not consider that is either desirable or necessary as it would extend the development further into the countryside and closer to the possible alignment of the bypass.

Recommendations

In the second sentence of the policy after "development" add "will be brought forward in accordance with a comprehensive masterplan covering both sites to ensure the delivery of essential onsite and offsite infrastructure and" and substitute "up to" with "approximately" and delete the third criterion.

In second criterion delete "no greater than" and insert "approximately" before "35"

In final criterion insert "any" before "infrastructure" and replace "under Policy ONP 18" with "to make the development acceptable in planning terms, is directly related to the development and is fair and reasonably related in scale and kind to the development"

At the end of the third paragraph delete "and OTC"

Replace fourth bullet point with "Proposals must be informed by the findings of a program of archaeological investigation undertaken according to a written scheme of investigation as agreed by the council's archaeological adviser. Development proposals must demonstrate the archaeological remains of national importance will be remained preserved in situ. Loss of remains of less than national importance will only be considered acceptable where it is necessary to deliver public benefits that could not otherwise be delivered and that outweigh the value of the heritage assets

lost. In such cases, it must be demonstrated that the layout and design of development has sought to minimise the loss of archaeological remains. Where it is felt that the merits of development justify the loss of archaeological remains that are identified as present, a suitable program of recording and publication of those remains will be required"

Policy 0NP5 – Safeguarded Site F

The policy merely repeats the relevant text Policy ONP2 and in order to give certainty as to what is the relevant policy for this site, I propose that Policy ONP5 be deleted.

Recommendation

That the policy be deleted

Policy ONP6 – Infill Sites and Windfall Sites

The policy accords with Secretary of State advice and strategic policy and I do not need make any changes as the policy meets basic conditions.

Policy ONP7 – Affordable Houses

I believe that that there is sufficient evidence to support this policy to provide an element of locally allocated affordable housing despite the in-principle reservations raised by Gladman Developments Ltd that development should meet district wide need. My only reservation relates to the requirement that all affordable dwellings remain as affordable in perpetuity. The inability to achieve this was pointed out in the Town Council's own commissioned report on housing need, which explained that tenants and part owners of affordable homes have statutory rights to acquire their home. It will only have been possible to retain affordability in perpetuity would have been by designating rural exception sites.

This element of the policy does not meet the tests of basic conditions and it is accordingly recommended for deletion.

Recommendation

Delete the last paragraph of the policy

Policy 0NP8–Housing Type and Design

This policy applies to **all** housing developments. I do not think it will be practical to require this policy to apply to single units.

The second element of the policy would not have passed the basic conditions test had it placed an actual *requirement* to meet the conditions. The Secretary of State issued a Statement to the House of Commons dated 25 March 2012 which prevents neighbourhood plans on setting standards for the construction, internal layout or performance of new dwellings. However, this policy merely *encourages* adherence and as drafted a planning application could not be refused under this policy. I have therefore decided not to recommend its removal.

Recommendation

Insert “beyond a single unit” after “developments”

Policy ONP9 - Communications Infrastructure

My only comment regarding the policy is that it places an expectation that it is the housebuilder that will provide the fibre link to the houses they have built. I do not think that is the responsibility of a housebuilder to provide the broadband service but rather they should provide the necessary infrastructure including ducting so that broadband providers can provide connections. I therefore consider that the second paragraph of the policy is over onerous and prescriptive so I will be recommending the deletion of that particular requirement and instead rely upon the final requirement which will enable the necessary connectivity to be available.

Recommendation

Delete the second paragraph of the policy.

Policy ONP10 - Health

I am content that this policy meets basic conditions.

Policy ONP11– Assets of Community Value

This policy misrepresents the legal position regarding Assets of Community Value. The registration of such assets lies with the unitary council i.e. Milton Keynes Council. It is open to Olney Town Council to promote the inclusion of such assets to Milton Keynes Council. The first part of the policy is not a statement of policy but rather a statement of intent.

The only matter within the second element is to provide clarification that the properties must be registered to be protected by the wording of the policy.

Recommendations

Delete all of the first sentence

Delete “an” and insert “a Registered” before “Asset”

Policy ONP12 - Safeguarded Employment Land.

I consider that this is an entirely appropriate policy. However, there have been in recent years, changes to permitted development rights, which allow the conversion of commercial buildings to residential or other uses. Some changes of use require what is known as "prior approval" covering a range of matters. To avoid confusion with such applications I propose the policy be clarified so as to relate to planning applications to avoid confusion with other types of applications which may be submitted to the local planning authority.

It has been drawn to my attention that the former Howden's site at the west end of the allocation has been the subject of a planning application for up to 8 dwellings. I note from the Council's website that planning permission has now been granted on 24th March 2017. I therefore do not consider that it is appropriate for this land to be safeguarded for employment purposes as it is now unlikely to remain in employment use.

Recommendation

Insert "planning" before "application"

Redraw the boundaries to remove that part of the allocation which is covered by the outline planning consent 16/03568/OUT for residential development.

Policy ONP13 - New Employment Land

I consider it entirely appropriate to allocate Sites B and C for employment related development. Proposals for Site B for an employment led mixed use development whilst Site C is for a more conventional B1, B2, B8 development.

I am not convinced that evidence has been submitted which substantiates the need for the two sites to be brought forward together in "a phased and comprehensively masterplanned approach". I believe that it would be entirely possible for the two allocations to be developed independently. Each site could meet the requirements of the policy in their own right. To insist on a comprehensive master plan, when it is not required, could possibly delay delivery of this sustainable economic development. I therefore propose to remove the requirement for as advocated in the third paragraph of the policy.

My earlier points relating to gaining the agreement of the town council as to what information is required to accompany a planning application, equally applies to this policy.

As with the residential allocations, Historic England has recommended the redrafting of the policies re archaeological investigations to bring it in line with the NPPF. I

propose to follow their advice to ensure that it meets basic conditions. This equally applies to the following policy too.

Recommendation

Delete the first sentence of the third paragraph

At the end of the third paragraph delete "and OTC"

Replace bullet point h) with "Development proposals should be informed by results of a programme of archaeological investigation undertaken to according to a written scheme of the investigation agreed in writing with the council's archaeological advisor. Where there are shown to be present, remains of national importance must be preserved in situ through the careful design and development, including careful use of layout and construction methods. Development resulting in loss of remains of regional or local interest will not be permitted unless it is shown that development proposals have sought to minimise the loss of remains and that areas of better preserved remains have been favoured for retention. Development proposals will be expected to provide mitigation of loss of archaeological remains through the provision of interpretation of the site's archaeological interest to increase public awareness and enjoyment of the area's past"

Policy ONP14 - Retail

This allocates the Site R for only a food store and a petrol filling station. I appreciate that the town currently lacks a supermarket and I suspect that most residents have to travel to surrounding towns for their food shopping. The agents for the site has argued that the size of supermarkets being currently sought by the major food retailers are somewhat smaller than those were some years ago. They have argued that not all of Site R should be allocated for retail purposes and that the surplus land could be set aside for residential purposes. However, I am satisfied that the neighbourhood plan has already allocated sufficient housing land. If there is surplus land after the food store and petrol filling station have been built, I consider another small retail unit could be located within this site which stands at the entrance to the town, subject to its meeting the requirements to demonstrate that it will not have a significant adverse impact on the vitality and the viability of the town centre.

Recommendation

Insert in second paragraph "retail" before "development" and after Site R add "including" and add "possibly" before "petrol filling station"

Replace second paragraph first bullet point with "Development proposals should be informed by results of a programme of archaeological investigation undertaken to

according to a written scheme of the investigation agreed in writing with the council's archaeological advisor. Where there are shown to be present, remains of national importance must be preserved in situ through the careful design and development, including careful use of layout and construction methods. Development resulting in loss of remains of regional or local interest will not be permitted unless it is shown that development proposals have sought to minimise the loss of remains and that areas of better preserved remains have been favoured for retention. Development proposals will be expected to provide mitigation of loss of archaeological remains through the provision of interpretation of the site's archaeological interest to increase public awareness and enjoyment of the area's past"

In fourth paragraph insert "any" before "improvements" and add at the end "which is required to make the development acceptable in planning terms, is directly related to the development and is fair and reasonably related in scale and kind to the development"

At the end of the fifth paragraph delete "and OTC"

Policy ONP15 - Open Space

There has been an objection to the drafting of the policy which is written as more of an aspiration than a policy. I concur with that view but I consider that I can recommend the modification of the policy so that it can be used as a tool of decision making.

Recommendation

Replace the first two paragraphs with "Proposals that result in the loss of the open spaces shown on the Proposals Map or result in the loss of existing community, allotment, sports or recreation facilities, will not be approved.

Policy ONP16 - Parking and Accessibility

There are three elements to this policy. The first element is not worded as a policy which could be used for the determination of planning application. Secondly it would not be appropriate for the requirements of the second element to be applied to all developments e.g. a small windfall infill site. I believe that the intention is for the policy to relate to the design and layout of new residential and business allocations. I proposed to clarify the wording so is it only relates to the allocations made in this plan.

My comments on a policy requiring developer contributions relate equally to this policy.

Recommendations

Delete the first paragraph

Insert “on allocated sites” after “developments”

In the third paragraph replace “required” with “sought” and replace all the text after “town” with “which are required to make the development acceptable in planning terms, are directly related to the development and is fair and reasonably related in scale and kind to the development”

Policy ONP17 - Olney Bypass

I am aware that proposals for the Olney bypass have been discussed for several decades. Nevertheless, it remains as strategic and important project for the town with two alternative alignments shown on the Milton Keynes Local Plan 2005 Proposals Map. I consider this an appropriate policy which supports strategic policy as set out in the development plan and it meets Basic Conditions

Policy ONP18 - Developer Contributions

I have major concerns regarding this policy which are referred to previously in this report. I am aware that the policy requires compliance with the existing Milton Keynes SPD however I suspect these pre-date the recent changes in the Community Infrastructure Levy Regulations relating to how financial contributions can be collected and pooled. This limits the scope for getting developers to put money into general funding pots rather than contributing to specific projects which are directly related to and arise from the development permitted. I have made reference to the policies where developer contributions would ordinarily be sought and I do not believe this policy as written meets basic conditions as it would not necessarily meet the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations. I therefore will be recommending the removal of this policy. I appreciate that this may be a disappointment to the Town Council but it is the consequence of the changes in the rules which cover Section 106 contributions.

Recommendation

That the policy be deleted

The Referendum Area

If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Olney Neighbourhood Plan as designated by Milton Keynes Council on 22nd April 2014, is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

The Town Council and the Steering Group are to be congratulated upon the production of a high-quality plan. My site visit confirmed that Olney has a really attractive thriving town centre with an outstanding conservation area, at its heart but set in beautiful countryside. The plan has taken the initiative to the locations that residents want new homes to be built. They are positive and well considered proposals.

I have had to recommend a number of changes which should not be seen as weakening the plan, but are required to bring the Plan in line with the basic conditions requirements set down in legislation. Most are prompted by the need for the plan to pay proper regard to Secretary of State guidance and advice, and particularly as it relates to developer contributions. The plan remains a coherent statement which on how the residents of Olney wish to positively shape their community when facing pressure for new homes and places to work. It seeks to protect important open space and sets criteria so that new development integrates with the existing urban area. The Town Council and the Steering Group are to be congratulated on their diligence and obvious hard work. This document will become an integral part of the development plan if residents vote to support the policies at referendum.

To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.

I am therefore delighted to recommend to the Milton Keynes Council that the Olney Neighbourhood Plan, as modified by my recommendations, should now proceed to referendum.

JOHN SLATER BA(Hons), DMS, MRTPI

John Slater Planning Ltd

25th March 2017

The Planning Inspectorate

Report to Milton Keynes Council

by David Spencer BA(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Date 12 Feb 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of

Plan:MK

The Plan was submitted for examination on 29 March 2018

The examination hearings were held between 10 - 20 July 2018 and 29 – 30 August 2018

File Ref: PINS/Y0435/429/10

Abbreviations used in this report

AQMA	Air Quality Management Area
BMV	Best and Most Versatile (agricultural land)
caMKox	Cambridge – Milton Keynes – Oxford Arc/Corridor
CMK	Central Milton Keynes
CMKAP	Central Milton Keynes Alliance Business Neighbourhood Plan
DtC	Duty to Co-operate
EEFM	East of England Forecasting Model
ELS	Employment Land Study
EWR	East West Rail
GTAA	Gypsy and Traveller Accommodation Assessment
HIF	Housing Infrastructure Fund
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
KIBS	Knowledge Intensive Business Services
LDS	Local Development Scheme
LIP	Local Investment Plan
MKC	Milton Keynes Council
MKDP	Milton Keynes Development Partnership
MKE	Milton Keynes East
MKMMM	Milton Keynes Multi Modal Model
MM	Main Modification
NDSS	Nationally Described Space Standard
NEP	Natural Environment Partnership
NIC	National Infrastructure Commission
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPA	Planning Performance Agreement
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PSA	Primary Shopping Area
SA	Sustainability Appraisal
SADPD	Site Allocations Development Plan Document
SCI	Statement of Community Involvement
SEMK	South East Milton Keynes
SEMLEP	South East Midlands Local Enterprise Partnership
SEP	Strategic Economic Plan (of the SEMLEP)
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SLA	Strategic Land Allocation (2013 Core Strategy)
SPA	Special Protection Area
SPD	Supplementary Planning Document

The report refers to key evidence documents and uses the same document referencing system taken from the examination library, for example [MK/HOU/001] etc.

Non-Technical Summary

This report concludes that Plan:MK provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Milton Keynes Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out an update of sustainability appraisal. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- A policy commitment to undertake a review of Plan:MK in light of the emerging plans for transformational growth along the Cambridge-Milton Keynes-Oxford corridor and strategic growth ambitions for the Borough. The Plan review shall be submitted for examination by the end of 2022;
- To positively allocate land at Milton Keynes East (east of the M1) for at least 5,000 homes of which at least 1,475 dwellings will be delivered within the plan period and potentially more (some 3,000 dwellings) if early infrastructure funding can be secured;
- To include a housing trajectory for the plan period and clarity on the sources of deliverable and developable housing land supply;
- To reaffirm the significance of Campbell Park as a strategic housing site within Central Milton Keynes in Policy SD3 and remove potential duplication by deleting Policy SD18;
- Amend the Primary Shopping Area designation in Central Milton Keynes;
- Include further specificity within the policies for South East Milton Keynes and Milton Keynes East on the requirements and criteria to guide these strategic developments;
- Include further clarity and comprehension within various development management policies;
- Include a new policy encouraging innovative design and construction on proposals of 50 dwellings or more; and
- Greater clarity on the strategic policies against which neighbourhood plans will be considered.

Introduction

1. This report contains my assessment of Plan:MK in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The revised National Planning Policy Framework was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Unless stated otherwise, references in this report are to the 2012 NPPF.

3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. Plan:MK (the Council's strategy for meeting the Borough's needs to 2031), submitted in March 2018 is the basis for my examination. It is the same document as was published for consultation in November 2017.

4. During the examination the Council received the report into the separate examination of the Site Allocations Development Plan Document (SADPD), which was duly adopted on 18 July 2018. The SADPD supports the implementation of the adopted 2013 Core Strategy by allocating a number of sites for development. These allocations are factored into the land supply considerations although Plan:MK does not supersede or replace the SADPD.

Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.

6. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out an update of sustainability appraisal. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Plan:MK Policies Map 2017 as set out in documents MK/SUB/015a-f.

8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. These further changes to the policies map were published for consultation alongside the MMs in a separate schedule (document (h) in the suite of October 2018 main modification consultation documents).

9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the October 2018 schedule of proposed Policies Map Modifications.

Assessment of Duty to Co-operate

10. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

11. From the Duty to Cooperate (DtC) Statement [MK/SUB/008] there is evidence of active and ongoing engagement between Milton Keynes Council (MKC), its neighbouring authorities and other duty to cooperate bodies. There has also been cooperation through the SEMLEP (South East Midlands Local Enterprise Partnership) Planners' Forum as evidenced in the DtC Addendum document [MK/EXAM/003]. Memoranda of understanding (MOUs) have been signed with neighbouring authorities and with a number of public bodies, including notably Highways England, Historic England, Natural England and the Environment Agency affirming cooperation during plan preparation prior to the formal submission of Plan:MK.

12. Strategic objectives 3 and 4 of the Plan express MKC's support for the wider growth agenda along the Cambridge – Milton Keynes – Oxford (caMKox) corridor and for joint working where development comes forward close to the edge of Milton Keynes. This collaborative outlook is being further realised in the joint work on the Strategic Growth Study involving MKC, Aylesbury Vale and South Northamptonshire Councils. Ongoing co-operation will remain a high priority given that the National Infrastructure Commission (NIC) Report 2017 and Government response 2018 both seek further collaborative working along the caMKox corridor.

13. There has also been early cooperation in determining Housing Market Areas through the jointly commissioned study for parts of Buckinghamshire,

Bedfordshire and Hertfordshire [MK/HOU/001]. Plan:MK seeks to meet the housing and employment needs apportioned within its administrative boundaries. There are no requests for Plan:MK to accommodate any wider unmet needs.

14. There is a scale of growth coalescing around the existing A421 corridor through the Marston Vale, Milton Keynes and through to the Aylesbury Vale. This growth is aligning to the emerging east west corridor containing both East West Rail (EWR) and the Oxford to Cambridge Expressway. In relation to Central Bedfordshire, notwithstanding the signed MOU, there are some residual concerns about the planned directions of growth in Plan:MK. In my view these are soundness matters rather than the legal duty to cooperate given the MOU with Central Bedfordshire clearly recognises the strategic sites proposed to the east and south-east of Milton Keynes.

15. Additionally, concerns have been raised about cooperation on transport modelling between MKC and Central Bedfordshire and Aylesbury Vale to take account of respective planned growth. In response to this point, I am satisfied that MKC sought to take a cooperative approach (evidenced in document MK/EXAM/029). Given the different Plan preparation timetables I accept the reasoning why a cross-boundary growth scenario has not yet been plugged into the Milton Keynes Multi-Modal Model. This can be done for future plan reviews and there has been no failing on the statutory DtC in this regard.

16. In terms of strategic cross-boundary infrastructure the most significant projects are at a national level and include EWR and the proposed Expressway. The various MOUs before me indicate good levels of cooperation on these projects through plan-making. At a more local level, the full dualling of the A421 from Junction 13 of the M1, the upgrading of the M1 to smart motorway standard and the Bedford to Milton Keynes Waterway Park project are being cooperatively supported.

17. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

18. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 9 matters upon which the soundness of the Plan depends. Under these headings my report deals with the main issues of soundness rather than responding to every point raised by representors.

MATTER 1: Planning for Growth

Issue 1 – With regards to the emerging strategic growth context is the Plan positively prepared? Is the Plan period consistent with national policy? Would the commitment to a plan review be justified and effective?

Emerging Strategic Context

19. The emerging strategic growth context is articulated in the MKFutures 2050 report (July 2016) [MK/MIS/001] prepared for the Council by an independent Commission in terms of its consideration of the future regional and national role of the City and the NIC report 'Partnering for Prosperity' (November 2017). The latter report addresses a potential new growth deal for the caMKox arc of one million additional homes by 2050 to support economic growth. Neither document has been subject to sustainability appraisal, detailed environmental or infrastructure capacity or independent examination. In broad terms, whilst a direction of travel for transformational growth is clearly emerging, neither report provides the necessary basis to significantly delay adopting Plan:MK in order to contemplate a higher, but as yet untested, growth strategy.

20. I recognise that there is government support for growth along the corridor, including investment for housing and strategic infrastructure. This will, amongst other things, provide valuable certainty for future plan-making along the corridor. However, the NIC report is unambiguous that transformational growth along the corridor (including the potential of new settlements) will require cross-boundary working and coordinated infrastructure delivery. The Government's response to the NIC report in November 2018 sets out a long list of what needs to be done next to achieve a collective ambition for the caMKox corridor. This includes, amongst other things, further work on strategic infrastructure corridors, a Joint Vision Statement to 2050, potential options for a pan-Arc spatial vision underpinned by a coordinated investment plan, further analysis around housing growth scenarios and looking at governance structures. Taking this into account, it would not be appropriate for future transformational growth to be pre-empted in a piecemeal way through additional strategic sites beyond those already identified in this round of plan making.

21. Turning to the MKFutures 2050 Report [MK/MIS/001] the document is clear that it is "a starting point for a constructive debate about the future of the City". It identifies six big projects for early action which Plan:MK appropriately responds to. Crucially, the report identifies that a new deal with Government "should be the starting point for further plans" and that "considerable further work will be required". The report identifies that there will be challenges in sustainably accommodating the City's growth to 2050. Consequently a growth strategy to 2050, as a successor report to MKFutures, is currently under preparation, which will be a key document to inform a review of Plan:MK.

22. In terms of providing appropriate foundations for transformational growth, it is important to recognise that Plan:MK does not disregard the MK Futures or

NIC reports. Plan:MK is predicated on meeting a full objectively assessed need (OAN) for housing which will result in a sustained level of significant annual housing delivery within the range identified in the MKFutures 2050 Report as providing a strong foundation for future growth. As submitted, the Plan presented a housing land supply that would exceed the requirement by some margin including laying the foundations for strategic growth east of the M1 (an option countenanced at page 37 of MKFutures 2050 report).

23. Overall, the submitted Plan:MK to 2031 proposes levels and strategic locations of growth that would not diminish the City's role as part of the wider caMKox growth ambitions and appropriately acknowledges the ambitions of the MKFutures 2050 and NIC reports.

Plan Period

24. The Plan on adoption would have a period of some 12 years expiring on 31 March 2031. The NPPF at paragraph 157 indicates that plans should preferably have a 15 year time horizon. It does not stipulate that plans should have a 15 year timeframe post adoption. Extending the Plan period, even on the basis of extrapolating the housing need over further years, would involve appreciable time and effort to update the evidence base, particularly on infrastructure and transport planning. Plan:MK is drawn up over an appropriate time frame so as to enable an up-to-date policy framework to be implemented and a deliverable supply of land. The Plan period is therefore justified.

Plan Review

25. Given the emerging strategic context and plan period of Plan:MK there would be a need to review Plan:MK sooner than the five year requirement. The submitted Plan:MK does not contain a review policy and I consider it would not be positively prepared was it to remain silent on this matter.

26. The timing of any review would need to be informed by the MK Futures growth strategy and wider dialogue with neighbouring authorities. It is not necessary that a review of Plan:MK must be a joint plan but it is sensible that this forms a reasonable option to be explored. Nor do I consider a binding MOU to prepare a joint plan would be necessary given the requirements of the DtC. The Government has set out its desire to see joint vision documents for the caMKox in 2019 and further evidence from the MKFutures growth strategy will also be available in 2019. With this in place, I see no reason why an expeditious review of Plan:MK cannot take place such that a new strategic plan could be submitted for examination by the end of 2022.

27. This would reflect that the Council itself recognises that Plan:MK is essentially an interim plan in the context of the emerging picture of strategic growth along the caMKox corridor. That is a realistic acknowledgement that Plan:MK serves as a critical bridge between the ongoing delivery of objectively assessed needs in the short to medium term and the need for the evidence base around transformational growth to be

further developed. That wholly accords with the Government's response to the NIC report which is clear that further assessment of the options for housing and infrastructure is required. A focussed review mechanism in Plan policy would also maintain the Council's stated ambition to deliver on the MKFutures work.

28. I therefore recommend the proposed Plan review policy at **MM3**, including some minor factual updates, and accompanying text at **MM2** to ensure the Plan would be positively prepared. Such a mechanism would be consistent with the PPG[1] and would avoid delaying the adoption of Plan:MK.

Conclusion

29. I therefore conclude that, with the proposed modifications, the approach to the emerging strategic growth context, plan review and plan period is sound.

Issue 2 – Are the Spatial Strategy, settlement hierarchy and policy approach to the countryside soundly based?

30. The submitted plan contains a clear, positively prepared spatial vision underpinned by a reasonable and justified set of strategic objectives. This includes consolidating Milton Keynes' role as a leading city and making positive early contributions to the wider growth ambitions for the caMKox corridor.

Role of Milton Keynes and the principle of expansion at the edge of the City

31. Milton Keynes City is confirmed as the top tier spatial location for growth and regeneration in Policy DS1. This is reasonable given the opportunities in the City to complete long-standing expansion areas and allocations, the prospect of additional development within Central Milton Keynes, the scope for new sustainable strategic urban extensions and the potential for various infill, regeneration and redevelopment opportunities.

32. Notwithstanding the focus in Plan:MK to diversify land supply and increase delivery within the urban area of Milton Keynes, additional peripheral greenfield land will be needed to meet development requirements over the Plan period. Whilst work is ongoing in relation to estate regeneration in the city and the Central Bletchley Prospectus Area (Policy SD19), it is too early to ascribe with any certainty what capacity these sources could deliver within the Plan period. Overall, I am satisfied that the 2017 Urban Capacity Study [MK/HOU/006] and the 2017 Strategic Housing Land Availability Assessment [MK/HOU/004] have reasonably considered what can be delivered within the existing fabric of Milton Keynes at this time.

33. It would be justified and effective for Plan:MK to apply a more positive outlook to the potential of Milton Keynes East (MKE) as an area of expansion to meet development needs during the Plan period and beyond. This would further consolidate the primary role of the City within the settlement hierarchy at Policy DS1. To clarify this, **MM4** would update the

[1] PPG Paragraph 004 Reference ID: 12-004-20160519

context on the role of MKE in delivering the spatial vision and is necessary for effectiveness and positive preparation. I have amended **MM4** slightly to clarify what could be delivered at MKE within the Plan period subject to the current infrastructure funding bid and the longer term capacity of the site allocated in Plan:MK.

The roles of key settlements and villages/rural settlements

34. The key settlements of Newport Pagnell, Olney and Woburn Sands all have a good degree of services, connectivity and employment which justifies their identification at this tier of the hierarchy. All of these communities have made neighbourhood plans with positive allocations for additional growth of 300 homes in Olney and 1400 homes in Newport Pagnell. These are sizeable scales of development which are accounted for in the Plan:MK housing trajectory. The neighbourhood plan for Woburn Sands makes no housing allocations, however the settlement boundary review in Plan:MK includes additional land on Newport Road and the South East Milton Keynes (SEMK) allocation comes close to the north-west edge of Woburn Sands. Accordingly, Plan:MK would not need to be modified to make a specific allowance for additional development in key settlements in order to be sound.

35. There is nothing in Plan:MK to inhibit the review of Neighbourhood Plans and those plans considering releasing additional land for development at a scale appropriate to the settlement hierarchy in Policy DS1. Overall, existing housing permissions and allocations in key settlements account for some 5% of the total housing land supply. I consider this is an appropriate proportion, reflective of the size and function of these settlements and the need to focus development within and around the City. It does not need to be increased through Plan:MK to ensure a sustainable pattern of housing development.

36. The third tier of the hierarchy amalgamates villages and rural settlements and advocates growth in compliance with made Neighbourhood Plans and within defined settlement boundaries. Recognising that the core principles of the planning system include securing sustainable patterns of development and responding to local character, I find this third rural tier to be appropriately identified. Good progress is being made on rural Neighbourhood Plans which are facilitating varying levels of additional housing to meet local needs.

37. As submitted, the role of the tiers in Policy DS1 would benefit from amplification. **MM5** would introduce new text into Policy DS1 which would clarify the primary role of Milton Keynes for new jobs and homes and that within the rural areas the focus for new development will be concentrated at the key settlements with only a limited role for the villages and other settlements. I recommend **MM5** so that Plan:MK is effective and therefore sound. **MM44** would specify which of the policies in Plan:MK are 'strategic policies' for the purposes of neighbourhood plan preparation although it needs to be amended to include Policy HE1 on heritage. Accordingly I recommend **MM44** for effectiveness and consistency with paragraph 184 of the NPPF.

Approach to the Countryside

38. A number of settlements beyond the urban conurbation of Milton Keynes have defined settlement boundaries and consequently Policy DS5 of Plan:MK seeks to define land beyond these boundaries as open countryside where development would be carefully managed. Such an approach would be justified, effective and would accord with the evidence provided on landscape character and the review of settlement boundaries in 2017 [MK/HOU/003]. There is nothing overly-restrictive about the policy approach to the countryside that would prevent thriving rural communities over the Plan period.

39. As submitted Policy DS5 would require modification to ensure consistency with the NPPF to allow for new dwellings of exceptional quality or innovation in accordance with paragraph 55 of the NPPF. The policy should also reference highway infrastructure as a type of development that may be permissible in the countryside. I recommend **MM10** accordingly for effectiveness and consistency with national policy.

Approach to Settlement Boundaries

40. Settlement boundaries are an established and well-recognised part of the development management system in the Borough. Neighbourhood Plans in the Borough are carrying forward the principle of settlement boundaries and I see nothing in Plan:MK that would restrict future Neighbourhood Plans revisiting and refining boundaries where appropriate in accordance with the settlement hierarchy.

41. Plan:MK presents the first opportunity in 23 years to systematically review settlement boundaries in the Borough. The methodology and outputs in the Settlement Boundary Study 2017 [MK/HOU/003][2] are robust. They reflect recent changes and matters of fact to present a consistent and up-to-date set of settlement boundaries to be defined on the updated Policies Map.

Presumption in favour of sustainable development

42. In accordance with NPPF paragraph 14, the presumption in favour of sustainable development should be an integral part of plan-making and thus flow through to decision-making. Consequently, there is no requirement for plans to repeat the presumption and submitted Policy MK1 and supporting text should be deleted. I therefore recommend **MM1** for effectiveness and to avoid undue repetition of national policy.

Conclusions on Matter 1

43. Overall, with the proposed modifications at MM1-MM5, MM10 and MM44, I find the strategic objectives, spatial vision and settlement hierarchy (Policy DS1) would be the most appropriate strategy to sustainably meet the Borough's development needs to 2031. Whilst much is evolving on the long term growth agenda, including along the caMKox corridor, an expedient plan review would be the most appropriate mechanism to consider future

[2] Partially updated in a 2018 version [MK/HOU/003a]

growth options, including through continued dialogue with neighbouring authorities.

MATTER 2: Housing Growth

Issue 3 – Is the housing need and the Plan's housing requirement justified, positively prepared and consistent with national policy?

Context for Objectively Assessed Housing Need

44. Plan:MK was submitted for examination in March 2018. As such the soundness of the submitted objectively assessed need (OAN) remains to be determined in line with 2012 NPPF and the relevant parts of the PPG. Approach to local housing requirements is evolving and the imminent review of Plan:MK would be able to respond to the latest methodology and any established policy requirements for the caMKox corridor. Overall, the stepwise approach to establishing an OAN, starting with the relevant household projections, as set out in the 2017 Strategic Housing Market Assessment (SHMA) [MK/HOU/005] is the valid approach for this plan.

Housing Market Area

45. As illustrated at Figure 3 of the SHMA there is a Milton Keynes functional HMA wider than the Borough and encompassing parts of Aylesbury Vale, Central Bedfordshire and South Northamptonshire. Approximately three quarters of the resident population of the functional HMA live in the Borough. In terms of establishing an OAN for Plan:MK, the SHMA applies a "best fit" HMA to the administrative boundaries of the Borough. This approach is justified and consistent with the PPG advice at paragraphs 2a-010 & 2a-011-20140306 on the definition of HMAs.

Demographic Starting Point and Related Adjustments

46. The SHMA applies the government's 2014-based household projections as the starting point. This reveals an overall growth of 21,922 households over the period (equivalent to 1,461 households per annum). The 2016-based population and household projections have emerged during the examination and after the hearings. The 2016 projections for Milton Keynes are lower but not markedly so. In accordance with PPG paragraph 2a-016-20150227 I do not consider the 2014-based projections should be immediately rendered out-of-date. They still provide a sound basis for establishing need.

47. The PPG at paragraph 2a-017-20140306 advises that plan makers may consider sensitivity testing including issues related to migration and demographic structure which could inform adjustments to the government's household projections. Government projections apply a 5 year trend for migration but historically, since 1991, migration has varied significantly in Milton Keynes as illustrated in the SHMA (notably paragraph 2.21 and Figure 10). I find the summary in the SHMA at paragraph 2.15 neatly justifies why a longer 10 year migration scenario would be reasonable on which to consider future housing needs. The principal and most persuasive reason would be the smoothing out of the evident fluctuations in migration

across key high and low points within the latest 2005-2015 economic cycle. Applying the 10 year migration scenario results in a higher population change compared to the 2014-based projections and I consider this robust.

48. In translating population projections into household numbers, the SHMA considers the matter of household representative rates. There remains some concern that suppressed household formation (in the 25-44 age cohort) remains a legacy issue of the last recession and requires positive remediation in the OAN going forward. The housing market has been relatively stable for some time as a backdrop to the 2014 based projections and no further adjustment for household formation rates is required.

49. Taking all of this together, the 2014 based projections result in a household forecast equivalent to 1,461 households per annum. Factoring in a 3.4% vacancy rate this equates to a need for 1,513 dwellings per annum. In contrast the 10 year migration scenario, on the same basis, results in a need for 1,596 dwellings per annum. The difference is explained by the 9% increase in population growth within the 10 year migration scenario over the same period (2016-2031). As explained above, I find this a convincing basis on which to plan for new homes given the particularly marked variability in net in-migration. As such it puts the OAN on a positively prepared footing when considering further adjustments. Such an approach also falls within the sensitivity testing allowed for by the PPG.

50. The SHMA makes a further adjustment as part of the demographically informed housing need in relation to concealed households and homeless households. There is nothing fundamentally inappropriate in factoring-in evidence of such households at an earlier stage of establishing a baseline housing need as a means of ensuring completeness. A further, separate adjustment for market signals (discussed below) would address the fuller suite of indicators listed in the PPG.

51. On this basis, Figure 34 of the SHMA reveals that there are 2,802 homeless, concealed or overcrowded households who have a need for affordable shelter. The SHMA appropriately nets this figure so that it reduces to 804 households in the Borough or 815 dwellings on applying a reduced vacancy rate for affordable stock. I consider this a reasonable adjustment to the 2014 based household projections.

52. Cumulatively, I find the various demographic adjustments to be clearly explained and robustly justified by the SHMA which has drawn its analysis from established sources. The demographically adjusted need of 1,650 dwellings per annum is justified, reflecting the particular circumstances in the HMA.

Further adjustments

Future Jobs

53. The demographically adjusted need will generate an additional economically active population of some 21,200 over the 15 years of 2016-31. The SHMA has examined the East of England Forecasting Model (EEFM) which identifies an increase of 31,900 jobs, which when netting off likely 'double jobbing'

results in an increase of 27,500 principal jobs. Once commuting patterns are taken into account (including net in commuting from adjoining areas) the SHMA concludes that some 1,739 additional dwellings will be required to generate the 2,400 additional workers needed. In terms of the robustness of this figure, I am satisfied that the SHMA has appropriately taken into account the labour market participation rates including older people working longer, more women in the workforce and economically active rates amongst young people stabilising after recent declines.

54. There is concern, however, that recent jobs growth has been far exceeding housing such that in-commuting levels could be better balanced by planning for additional homes in the Borough. The SHMA analysis appropriately assumes no change in commuting ratios and trends observed in the 2011 Census. This means that Milton Keynes will remain a net draw on workers pulling in notable numbers of economically active from surrounding areas. There is no evidence before me that the 2011 Census commuting ratios have not been similarly assumed in other parts of the wider functional HMA or adjoining SHMA work. Given the connectivity of Milton Keynes and proximity of parts of Central Bedfordshire and Aylesbury Vale, it does not follow that a continuation of existing commuting patterns during the Plan period would result in unsustainable patterns of growth.

55. In terms of the general alignment between the SHMA and the EEFM I am mindful that economic forecasting can be volatile as evidenced in the variation between the 2016 and 2017 EEFM outputs[3]. Across the wider SEMLEP area the cumulative OAN at the time of this examination is 11,289 per annum. The EEFM for the same area totalled 11,109 in 2016 and 11,376 in 2017. Overall, I am satisfied that the SHMA's approach to future jobs to inform Plan:MK appropriately sits within a consistent picture across the wider functional economic area such that a workforce for future jobs can be sustainably met. Given the fluctuations in modelling, I am not persuaded that the OAN should pivot on a higher figure of 2,155 dwellings in the 2016 EEFM.

56. Overall, based on a number of key assumptions, I find that the analysis is robust to identify that an additional 1,739 dwellings would ensure a sufficient workforce population to meet the likely demand for future jobs as presented at paragraph 4.38 and Figure 44 of the SHMA. I am satisfied that such an approach accords with PPG paragraph 2a-018 in terms of providing resilience to local businesses and avoiding unsustainable commuting patterns.

Market Signals and Affordability

57. The SHMA has taken into account the relevant market signals and undertaken appropriate indicator comparison with locations of similar demographic and economic character as per PPG 2a-020-20140306. Despite housing delivery being robust and better than the national average, affordability indicators in the Borough are worsening including substantial rises in lower quartile house prices since 2005 and deteriorating ratios

[3] See Page 2, ORS update paper July 2018 [MK/EXAM/013]

between lower quartile house prices and earnings. Additionally, house prices in Milton Keynes have remained consistently above the national average since 2001 and risen at a notably faster rate than the national average since 2009. Median private sector rents have also increased across all property sizes in Milton Keynes since 2010/2011 by approximately 20% such that average rents in the Borough are higher than nationally across England and with comparator locations[4]. Indicators on overcrowding and homelessness and temporary accommodation are also worsening.

58. An adjustment for market signals needs to be made. The PPG does not define what an upwards adjustment should be other than the level should be reasonable reflecting the degree of affordability constraints and a corresponding additional supply response.

59. The SHMA advocates 10% uplift for market signals equating to 1,579 dwellings to avoid double counting with concealed households already factored in to the demographically adjusted OAN. Alternative submissions invite significantly higher uplifts of between 15% and 25%. A notable amount of work has been undertaken to benchmark Milton Keynes against other examined local plans over the past 2 years in the wider south-east of England. The 10% figure proposed sits well within the range of uplifts within other South-East Plans dealing with broadly comparable affordability pressures and would result in approximately a 1.6% increase in the housing stock.

60. The 10% uplift for market signals (1,579 dwellings) would be effective, justified and positively prepared and in accordance with the relevant advice in the PPG (paragraphs 2a-019 and 2a-020). However, I consider it important to recognise that a number of separate positive adjustments to the demographic starting point are proposed. There should not be a compounding of upwards adjustments so as to result in a distorted OAN. Accordingly, the higher adjustment of 1,739 dwellings for future jobs would also appropriately address the need to respond to market signals.

61. As part of the suite of indicators on market signals, the PPG refers to rates of development and whilst a SHMA presents the opportunity to "re-set the clock" there is nonetheless an issue that the household projections have a base date of 2015 whereas the Plan period has a base date of 2016. In considering local circumstances the SHMA presents a separate adjustment to respond to the backlog of housing provision in the 2015/16 period which is 553 dwellings. This adjustment to OAN would be spread over the Plan period and would be soundly based.

Other Local Circumstances

62. In relation to older persons accommodation the OAN does not include the 1,032 persons aged over 75 projected to be living in communal, care and sheltered establishments. Applying typical care home occupancy rates the 1,032 persons would generate a need for approximately 1,200 bedspaces.

[4] SHMA, Figure 54, page 73.

If this fails to materialise, housing would not be released as anticipated to meet the wider housing need (SHMA paragraphs 6.16-6.23).

63. Whilst the submitted Plan:MK does not make any specific allocation for bedspaces, Policy HN1 supports a mix of housing types and Policy HN3 facilitates the provision of supported and specialist housing. This approach may well deliver the care accommodation but in the absence of specific allocations there would be a degree of risk and in turn implications for the OAN being met. On the whole the approach in Plan:MK is not consistent with the PPG advice at paragraph 3a-037-20140306 on older person's accommodation and I find it unsound.

64. To address the situation, in accordance with the advice at paragraph 6.23 of the SHMA, **MM6**, amongst other things, would introduce a target of 1,200 bedspaces within C2 institutions over the Plan period together with a commitment to monitor provision. This would negate the need to adjust the OAN for this Plan with monitoring informing the Plan review. I therefore recommend **MM6** for effectiveness and consistency with national policy.

Conclusions on OAN

65. I find the approach of the SHMA in establishing the full OAN at 1,766 dwellings to be reasonable. It follows the steps set out in the PPG and applies a series of sound assumptions, based on analysis of appropriate evidence, to arrive at a robust and positively adjusted level of need.

The Housing Requirement

66. The housing requirement of at least 26.500 dwellings is the same as the full OAN. The SHMA assesses in some detail the need for affordable housing and concludes that of the OAN of 26,500 homes, 8,200 would need to be affordable (31%). I am satisfied that this assessment in the SHMA is robust. Recent delivery has been only marginally below this (28%) and the scale and quantum of proposed housing allocations presents an opportunity to viably secure an overall quantum of affordable housing broadly in line with the 8,200 identified (affordable housing completions and a supply pipeline of 8,177 in Table 2, MKC statement on Matter 3). I therefore conclude that no further adjustment would be necessary to the housing requirement.

67. As set out above, the emerging housing figures presented as part of the wider agenda for transformational growth should not impact the housing requirement in Plan:MK. In coming to this view I note the MK Futures 2050 Commission report refers to a sustained delivery range of 1,750-2,000 dwellings per annum (p.36). The proposed housing requirement would be within the range and does not need to be adjusted.

68. In conclusion, the housing requirement of 26,500 dwellings at Strategic Objective 2 and Policy DS2 of Plan:MK is soundly based in that it is positively prepared and would be effective in addressing the need for a variety of housing, including affordable provision. Given the potential scope for urban regeneration and intensification within Milton Keynes, it should be clarified that the 26,500 figure is a net requirement and **MM6** would do this.

Issue 4 – Whether the Plan provides a sound assessment of the accommodation needs of gypsies and travellers?

69. The SHMA includes a Gypsy and Traveller Accommodation Assessment (GTAA). The Plan allocates a permanent pitch provision totalling 19 pitches (12 carried forward from previous plans and 7 net new pitches) and no transit pitch provision. In terms of the GTAA evidence there is a need for 5 permanent pitches for gypsies and travellers meeting the latest planning definition[5]. The balance of 14 pitches would meet the needs of those households who whilst not meeting the planning definition still express a preference for non-bricks and mortar accommodation.

70. Section 124 of the 2016 Housing and Planning Act requires a wider assessment of caravan and houseboat needs to underpin strategic policies and site allocations. This is a complex area of work, which may well involve adjoining authorities. There is little before me that the Plan has under-estimated wider caravan or houseboat needs. Accordingly, I do not consider the adoption of Plan:MK should be delayed in terms of carrying out a wider assessment. This should form part of the imminent plan review.

71. Overall, I find the approach to identifying the need for additional gypsy and traveller provision and the resultant requirement in Policy HN11 to accommodate 19 permanent pitches over the period to 2031 to be soundly based and in accordance with the Government's Planning Policy for Traveller Sites (PPTS). I deal with proposed allocation of 7 net new pitches at SEMK separately below under Matter 4.

MATTER 3: Jobs Growth and Employment Land

Issue 5 - Is the overall need and requirement for jobs soundly based, reflective of local circumstances and justified by the evidence?

A clear economic vision and strategy for the area

72. Milton Keynes is within the SEMLEP area with a final version of the Strategic Economic Plan (SEP) [MK/MIS/006] published in November 2017 which sets out the strategic economic direction to 2050. Plan:MK aligns with the SEP including its objectives to improve infrastructure[6] and unlock employment and housing sites. The strategic objectives and policies of Plan:MK also support the 2017 MK Economic Development Strategy [MK/EMP/005].

73. Policy DS3 sets out the employment development strategy of the Plan. It seeks to capitalise on the Borough's geography, not least the economic potential of the caMKox corridor. Furthermore, the strategy appropriately seeks to continue a focus on CMK as a hub for knowledge-based activity and as a location for a new central University Campus (MK:U). The focus on CMK as a vibrant hub for employment (particularly office accommodation) is reinforced by the excellent opportunities to make more of its relationship to the adjacent railway station and the genuine potential to shift to walking

[5] GTAA in SHMA, Figure 87
[6] Including Local Growth Fund (LGF) monies for A421 dualling from M1 Jct 13 and Bletchley station improvements.

and cycling as a way of commuting to work. Recent evidence on demand for office floorspace (M1 South Offices Market report [MK/EMP/009]) shows that whilst office floorspace has fallen in CMK in recent years (reflecting loss of some dated/lower quality premises), there is now an upturn in demand. Overall, I find the evidence supports that some additional provision for office floorspace should be made in CMK.

74. Policy DS3 could be clearer by positively stating that in addition to CMK, strategic provision will be made at South Caldecotte and MKE and to specify the supply of employment land provided for by Plan:MK. Additionally, Policy DS3 should be expanded to better align with NPPF paragraph 21 to express encouragement for the appropriate growth and expansion of existing businesses in the Borough. **MM9** would make these various changes and I recommend it for effectiveness and consistency with national policy.

Future Jobs Growth

75. Whilst Milton Keynes may be currently bucking national trends in terms of recent job creation there is no longer significant public sector investment to bring serviced land forward and there is uncertainty with factors such as automation, skills constraints and some notable recent closures of large employers. Accordingly, the prudent outlook of the Council that employment will continue to positively grow but the rate of jobs growth will slow is justified.

76. This is borne out in the 2017 Milton Keynes Economic Growth and Employment Land Study [MK/EMP/003] (the ELS) which has looked at two jobs growth forecasts for the 2016-2031 period. The first, by Experian, estimates that some 28,000 jobs will be provided over the Plan period and the second forecast, using the EEFM, estimates 31,932 jobs over the same period. The EEFM model assumes significantly high numbers of Knowledge Intensive Business Services (KIBS) jobs being created and is more positive about some other sectors compared to Experian. I accept that forecasts for jobs can be "lumpy", reflecting volatility but nonetheless there is very little to suggest that neither forecast could be realised under Plan:MK.

77. Plan:MK would as a minimum meet the higher EEFM forecast which would be sufficient for immediate needs. Should jobs growth prove to be higher and as aspirational as the NIC report envisages I am satisfied that a healthy existing land supply, the ongoing potential of CMK and additional land releases through Plan:MK can combine over the Plan period to ensure jobs growth is not constrained.

Issue 6 - In terms of delivery is the strategy and land supply to meet the requirement positively prepared and consistent with national policy?

Future Employment Land Requirements

78. A consistent theme in the analysis is that when applying either the EEFM or Experian forecasts (87ha and 132ha respectively) the pipeline of available employment land has generally been sufficient for future demand. Whilst there may be a sufficient quantitative supply to support the needs of general employment uses, there are quantitative and qualitative issues

regarding the land supply for larger warehouse and distribution uses. This is an issue which Plan:MK must positively address.

79. Applying the more positive Experian forecast of a gross need for 104 ha of land for warehouse and distribution uses, the existing supply pipeline of 56.5ha leaves a net requirement for 47.5ha. Given the healthy supply of employment land for general, established employment needs and the opportunities in and around CMK to bolster a cluster of KIBS, the quantum of land supply identified to address qualitative need for additional warehousing and distribution uses at 47.5 hectares is soundly based.

80. There are clearly longer-term aspirations for the local economy arising from the NIC report and elsewhere to harness the potential for high value, knowledge based employment linked to the improved connections to Cambridge and Oxford via the EWR and Expressway projects. Furthermore, the proximity of Cranfield University and the Technology Park in Central Bedfordshire, the provision within Plan:MK for a university campus within CMK adds to the evidence that having a moderate over-supply of employment land would be justified and effective. As such it would be justified for Plan:MK to make provision for additional employment land above the 47.5ha identified in the ELS. MKE represents the most appropriate location to provide for additional employment land in the medium to long term and I address this in more detail in Matter 4.

81. The Plan seeks to accommodate the provision for employment land on larger strategic sites rather than disaggregating provision over a number of sites. This is a sound approach given the need for larger land areas for storage and distribution and the infrastructure required to service these sites.

82. The SA has considered an alternative option of land north east of Newport Pagnell. There would be distinct disadvantages of splitting the need for additional employment land on to sites which in themselves cannot meet the totality of supply (47.5 hectares) for the larger warehouse and distribution uses. It is also a fair conclusion in the SA that land north east of Newport Pagnell is sequentially less preferable than the other two options at South Caldecotte and MKE. Plan:MK would appropriately provide for employment land well related to the strategic road network (M1 and A5) in locations accessible for employees. This is a justified and effective approach and the most appropriate when considered against the alternatives.

83. I deal with strategic site options in detail below in Matter 4 but at this strategic level it is clear that South Caldecotte would be the most appropriate option for meeting the identified need for additional employment land in the short term. In contrast MKE will take longer to come to fruition and as such does not remove the need for South Caldecotte. As a longer term site it would not prejudice future strategic choices for employment land given its good relationship to the M1 and Expressway. As set out above Policy DS3 would make clear the role of MKE as a strategic location for employment development over the longer term through **MM9** as recommended.

Conclusions on Future Jobs and Employment Land Supply

84. The future jobs numbers and assessment of employment land supply are robust. The focus on CMK, existing employment sites and strategic additional provision at first South Caldecotte and then MKE is justified and would be effective in enabling the local economy to grow and develop in line with local, SEMLEP and wider caMKox ambitions appropriate to the Plan period. The Plan is also positively prepared by enabling a new university campus (MK:U), reallocating employment land which is no longer fit for purpose and supporting technology and working environments likely to boost productivity.

MATTER 4: Strategic Sites

Issue 7 – Whether the strategic sites will deliver sustainable development to meet identified needs?

Introduction and approach to site selection

85. Drawing on sources such as the SHLAA and ELS evidence, I am satisfied that the SA presents an appropriate rationale as to why only a focused pool of sites progressed to detailed assessment. Overall, I find the judgements in the SA to be reasonable and the strategic site selection process to be soundly based.

86. Whilst there are individual policies for each proposed strategic site allocation addressing site specific matters, it is important not to lose sight that Policy SD1 provides over-arching place-making principles and Policies SD11 and SD12 provide further principles on planning for sustainable urban extensions. Policy SD1 requires further clarity and comprehension including enhanced references to consideration of the effects on the historic environment, biodiversity and green infrastructure and ensuring highway infrastructure reflects the Council's latest Mobility Strategy. **MM11** would introduce these clarifications and I recommend it for Plan effectiveness.

South East Milton Keynes (SEMK)

The Principle of SEMK as a strategic urban extension

87. The proposed urban extension at SEMK for 3,000 homes would form part of a logical consolidation of the south-easterly expansion of Milton Keynes. The judgements applied in both the SHLAA and the SA as they relate to this area have been demonstrated to be reasonable. The proposals at SEMK would be very well aligned to the developing spatial pattern of east-west growth to the south of the City.

88. A particular consideration with the proposed SEMK is whether the proposed EWR and Expressway give rise to uncertainties over its deliverability. SEMK would be well-connected to Woburn Sands for EWR and Bow Brickhill for local services. Whilst frequency of services along the Bletchley to Bedford

line would increase, there is no evidence before me that noise cannot be adequately mitigated or the proposed bridge crossing within the site cannot be delivered. On this basis EWR would not be an insurmountable barrier to delivering the site and creating a new cohesive community. SEMK represents the only urban extension option that can locate new housing directly adjacent to existing rail stations, a particularly positive factor that supports its allocation.

89. The 'Oxford to Cambridge Expressway Strategic Study Stage 3 Report' identified 3 potential corridors within which a road route could be accommodated. The precise alignment of the route remains to be announced by Highways England and that should become clearer with a preferred route announcement in 2020. There is very little in the available preliminary technical evidence or within the signed MoU with Highways England that Plan:MK should preclude land from being allocated within the broad route corridors. Initial work demonstrates that the land area identified for allocation can accommodate the land-take necessary for an Expressway as well as 3,000 homes and associated infrastructure.

90. In respect of the Expressway, submitted Policy SD13 inhibited the grant of planning permission at SEMK until 2019/20. In light of the latest evidence and the likely timetable for the Expressway such an approach would not be justified or effective and the prescriptive date should be removed. It nonetheless remains necessary to clarify in Policy SD13, that to secure the coherent, comprehensive development of the site the timing of the grant of planning permission for housing and associated uses would be contingent on the alignment of the Expressway being established. **MM15** would make the necessary changes to the first part of Policy SD13 and I recommend them for soundness.

91. Turning to other matters on the principle of SEMK, I note there are no objections from neighbouring authorities, recognising the need to continue cross-boundary dialogue on matters such as the local road network in Woburn Sands and Aspley Guise. There is local concern that SEMK would result in the harmful coalescence of the City with Wavendon, Woburn Sands and Bow Brickhill. These communities are currently only modestly separated from the existing edge of Milton Keynes such that the proposed allocation will inevitably result in development in close proximity to them. There are few options to expand and grow Milton Keynes that would not result in the City extending closer to surrounding settlements. In the case of SEMK the harm would be mitigated by proposed scale of strategic green buffers and landscaping. Policy SD13 could be more effective in this regard and I recommend the clarity on this point to criterion 3 in Part B of the policy in **MM15**.

Environment and Heritage at SEMK

92. The proposed allocation is relatively free of environmental constraints. It does contain BMV agricultural land but this is not unique to SEMK and the SA robustly demonstrates that wider public benefits would outweigh the harm. This could be mitigated further by aligning green infrastructure to BMV land. There is no evidence that SEMK would adversely affect the

nearby Greensand Ridge Nature Improvement Area. Initially, SEMK would be visible from footpaths that criss-cross the Greensand Ridge, but over time, with strategic landscaping in place there is no reason why SEMK would not successfully assimilate into the wider 'city within the trees' character. Nonetheless, Policy SD13 should make specific reference to mitigate any harm to the wider landscape character in the Brickhills area and I recommend this part of **MM15** for effectiveness.

93. There are various heritage assets in the locality, notably the scheduled monument of Danesborough hill fort on the Greensand Ridge and listed churches. Given the topography, the intervening distances, the scant inter-visibility and lack of persuasive evidence that the site is integrally part of the setting of these heritage assets, there would be no harm to their heritage significance. The site is likely to have some potential archaeological value and as such an additional criterion to Policy SD13 would secure an appropriate level of study in line with paragraph 128 of the NPPF and I recommend its inclusion as part of **MM15** for effectiveness.

Connectivity and infrastructure of SEMK

94. The site would be well connected by rail and would support existing bus services and extend routes through the site. Local services and facilities in Woburn Sands and southern parts of Milton Keynes (including Old Farm Park) would be within walking and cycling distance. The scale of the allocation would support further local service provision within walking and cycling catchments. Critically, the site is well-related to the existing employment estate at Tilbrook, Caldecotte Lake Business Park and the proposed South Caldecotte employment allocation.

95. Principal connectivity via the existing local highway grid network would be away from Woburn Sands and Bow Brickhill such that there is little to support the submissions that the local highway network would be adversely affected. In terms of securing appropriate connectivity in the southern part of the site, the railway line would need to be safely crossed. From the evidence to the examination there are no insurmountable reasons why such connections cannot be secured. I accept that EWR would have a bearing on this and consequently it would be premature for Plan:MK to provide precision on how and where the railway would be crossed, however, as submitted Plan:MK remains opaque on this important site specific matter and therefore not effective. I recommend the additional description proposed in **MM15**, including that the matter is appropriately resolved through the required development framework.

96. Critically, the site presents an opportunity to secure additional school provision not only to serve the allocation but in respect of secondary education for a wider catchment to the south of the city. The delivery of a new secondary school in this part of the Borough further justifies the proposed allocation. As submitted the Plan is silent on the required education infrastructure. To add necessary specificity and make the Plan effective and consistent with national policy, **MM15** would introduce the required level of education provision at a new criterion in Part B of Policy SD13 and I recommend the modification accordingly.

Meeting housing need

97. The site would be largely developable within the Plan period. There is likely to be considerable overlap between the development framework and initial planning applications such that the sequence should be that the framework required by Policy SD12, can be approved prior to the approval of planning applications rather than the submission of planning applications. **MM15** would introduce this change in Policy SD13 and I recommend it for positive preparation in order to facilitate delivery as soon as possible.

98. A number of additional parcels of land are now proposed to be included in SEMK since Plan submission which have been consulted on. They largely represent logical infilling and modest peripheral parcels that would consolidate the proposed allocation. I do not consider an adjustment to the 3000 home capacity would be necessary but it would provide additional scope and flexibility for the site to accommodate a variety of development, including a potential alignment of the Expressway. Accordingly, I recommend the amended extent of SEMK as per **MM16** so that the Plan is justified and effective.

99. As addressed under Matter 2 above, there is a need for additional permanent pitch provision for gypsies and travellers. SEMK presents an opportunity to create a new site of sufficient critical mass distinct from provision elsewhere in the Borough. Previous plans in Milton Keynes have contained similar approaches to gypsy and traveller pitch provision as part of new residential allocations (Newton Leys), providing confidence that the approach works. Given the extent and scale of the allocation there would be sufficient scope to appropriately plan for the pitch provision within a comprehensive development framework for the site in accordance with the PPTS and Policy HN11 of the submitted Plan. The requirement in Policy SD13 that the allocation provides for 7 pitches for Gypsies and Travellers is therefore justified.

Conclusion on SEMK

100. Notwithstanding the sequencing around any final route alignment for the Expressway, SEMK presents a highly sustainable and logical extension to Milton Keynes that presents one of the best options to align growth in the Plan period to the future emphasis on east-west connections with Cambridge and Oxford whilst being sustainably connected to jobs, services and facilities in Milton Keynes. There will be a lead-in time to delivery but given the site is relatively free from constraint there is no reason why it should not make a substantial contribution to development during the mid and latter parts of the Plan period.

Milton Keynes East

Principle of Milton Keynes East (MKE) as a strategic urban extension

101. MKE as a location would be about 3.5km from CMK, adjacent to Newport Pagnell and about 4.5km from Cranfield University and Technology Park. It is adjacent to the M1 corridor and would not be remote from the Oxford to Cambridge Expressway. Accordingly, MKE represents a good fit within the wider, long term spatial strategy emerging for the Borough. As demonstrated by SA, I am satisfied that MKE would represent a reasonable option for a sustainable strategic urban extension to Milton Keynes, for this plan period and beyond, that would not prejudice or foreclose any wider strategy for long term growth likely to emerge from the caMKox corridor and MK Futures work.

102. Eastward expansion of Milton Keynes has given rise to concern for communities in Central Bedfordshire. It is clear from the MOU with Central Bedfordshire that there has been dialogue [MK/SUB/008 pages 20-25] and general support for Policy DS2 and focusing housing within, and adjacent to, the existing urban area. The MOU recognises that should MKE come forward in the Plan period there will be ongoing liaison[7]. In terms of a principal concern relating to transport impacts, the Milton Keynes Multi Modal Model (MKMMM) outputs are clear that there will not be any significant implications arising from MKE for communities in Central Bedfordshire. Longer term, the prospect of a fast mass transit transport connection between Milton Keynes and Cranfield offers scope to reduce car borne traffic through local villages. MKE would provide critical mass on the proposed route to support the realisation of a transit system.

103. MKE would bring development in close proximity to Moulsoe such that Moulsoe's identity as a stand-alone village would be appreciably reduced. However, large parts of the village to the east of the church would have no direct inter-visibility with MKE. In terms of the harm that would arise, given the edge of urban Milton Keynes is already palpable from the western edge of Moulsoe this would be moderate and in large part capable of mitigation by maintaining an undeveloped green buffer around Moulsoe village.

104. The extent of the site was amended on submission to include a further parcel of land to the north (PM3 in MK/SUB/004c). This additional area of land does not fundamentally alter the scale of MKE or result in any significant harm. It would enable a more comprehensive development. I therefore recommend **MM17** to illustrate the consolidated extent of MKE.

Environment

105. There are few environmental constraints to MKE. There is no evidence that the extent of fluvial flood risk has been underestimated in the locality and that areas of highest flood risk cannot be avoided through the core of the Ouzel valley being retained as part of a wider corridor for green and blue infrastructure. As a commercially farmed area on the urban edge of Milton Keynes, which includes a sand and gravel extraction site, and dominated and disrupted by the M1, A509 and A422 roads, the condition of the landscape here is moderate to weak. Development at MKE presents an opportunity to positively respond to landscape management guidelines as

[7] MK/SUB/008 paragraph 3.16-3.17, page 23

well as broaden biodiversity and improve connectivity for wildlife consistent with the Council's Green Infrastructure Strategy 2018. Nonetheless, as submitted Policy SD14 lacks some specificity for MKE in terms of the requirements to mitigate environmental impacts and the opportunities for net gains in green infrastructure and ecological connectivity. **MM18** would do this and I recommend for plan effectiveness.

106. In terms of environmental conditions, the proximity of the M1 and the Cotton Valley sewage treatment works at Pineham have not generated any objections from Highways England, environmental health or Anglian Water. The air quality management area (AQMA) at Olney on the A509 is some distance to the north. Traffic modelling under both Scenarios 2 and 2b in the MKMMM does not reveal significant or appreciable volumes of traffic above the reference case being assigned from Plan:MK growth northbound on the A509[8]. Overall, and subject to appropriate master-planning, the MKE proposal would not result in any significant adverse impact on the living conditions of existing and future residents.

Heritage

107. The site contains a Grade II listed building (former farmhouse) within the Holiday Inn complex on the A509 and forms part of the setting of the Grade I listed church in Moulsoe. In terms of the Grade II building, it has already been extended by modern buildings to form the hotel and the setting is further affected by the busy A509 and ancillary car parking and modern farm buildings to the west. MKE would not have any adverse effect on its heritage significance. In respect of the Grade I church, its setting includes being a prominent feature atop of the shallow ridge above the valley of the Ouzel. In an immediate context, the setting would be retained by the proposed degree of separation between the edge of MKE and the village of Moulsoe and the location of MKE in the lower farmland plain.

108. In some wider views the general setting of the church would be interrupted by the proposed development but any harm to the heritage significance of the church would be less than substantial. The NPPF advises at paragraph 134 that less than substantial harm should be weighed against the public benefits of a proposal. In the case of MKE the substantial public benefits of securing sustainably located jobs and homes in an area of recognised growth would outweigh the harm identified.

109. Whilst there are no designated archaeological assets within the site, it is likely to be of archaeological interest. Policy SD14 lacks some specificity in relation to built heritage and archaeology. A new final bullet point within the policy would address the issue, and I recommend this part of **MM18** for plan effectiveness and consistency with national policy.

Connectivity

[8] Approximately 60 additional two-way vehicle movements during the AM peak and 175 additional two-way movements during the PM peak

110. Opportunities to extend existing bus routes and the Redway network into the area exist enabling the site to be directly connectable to CMK and the wider urban fabric of Milton Keynes without reliance on the car. The site is also close to the MK Coachway facility at Brook Furlong for wider connections. The site also provides the potential to secure Park and Ride provision on a side of the City where it would be operationally justified in line with MKC's Mobility Strategy. As set out above, ambitions to set up a fast (limited stop) mass-transit system to connect CMK to Cranfield University relate well to the site (referred to as a 'bullet bus'). These are all positive factors which support the allocation of MKE.

111. The evidence base on transport and movement[9] enables a more detailed Policy SD14 that would provide enhanced certainty in terms of setting guiding parameters for the preparation of a development framework for the site and subsequent planning applications including how the site should connect to the existing grid road network, the need for new and/or enhanced vehicular crossings of the M1 and the principle of safeguarding a fast mass-transit route to/from CMK. Finally, the policy needs to be clearer about the potential of the site to connect into, and extend, the network of segregated footpaths and cycling routes including appropriate crossings of the A422 and M1. **MM18** would address these required amendments in respect of connectivity at MKE and I recommend them for plan justification and effectiveness.

Timing and Delivery

112. As submitted the Plan is unclear on the role and function of MKE stating variably that the site is a 'strategic reserve' and elsewhere that it is 'allocated'. As submitted the Plan is unsound and additional clarity would ensure the Plan is effective and positively prepared in relation to MKE.

113. MKE has a potential key role to play in the next phase of City growth and has a reasonable prospect of coming forward within the Plan period. This needs to translate into a positive allocation in Plan:MK recognising that the scale of its contribution to meeting development needs relates to whether or not current funding submissions to Government can positively unlock growth sooner. This would align with the indicative Process 'Road Map' which has been produced for MKE[10].

114. Fundamentally, the identified constraints at MKE are not insuperable and the issues are funding and timing, primarily in relation to the capacity of Junction 14 of the M1 and alternative means to alleviate traffic movements around and through the junction. Highways England has not objected to the principle of MKE or additionally crossing the M1 to mitigate additional movements associated with MKE (as modelled under MKMMM scenario 2b). In terms of moving matters forward MKE has been the subject of a stage 1 bid to the Housing Infrastructure Fund (HIF) for approximately £76million

[9] Including Technical Note: Mitigation Testing at MKE (24 April 2018) submitted by MKC as INS1d 3 June 2018
[10] MK/SOCG/001a Appendix 2

which was successfully shortlisted in March 2018. It is noteworthy that the bid was supported by Highways England and the SEMLEP amongst others.

115. There is now joint working on a detailed Stage 2 bid which if successful would enable up-front strategic infrastructure to be provided. Even if the HIF stage 2 process were to be unsuccessful other funding options remain such that there would be a reasonable prospect of development at MKE within the Plan period albeit later rather than sooner. Accordingly, as set out above under Matter 2, I find that MKE would be capable of delivering of at least 1,475 dwellings during the Plan period. This is a cautious figure that could increase significantly to around 3,000 homes in plan period if the current HIF bid is positive. Longer term capacity beyond plan period would take the scale of the site identified in Plan:MK to around 5,000 homes.

116. Accordingly, I find it would be necessary to amend Policy SD14 to state that development can take place at MKE prior to 2031 provided the necessary strategic infrastructure is funded and delivered. From all the joint material provided in the MKE Development Statement June 2018 [MK/SOCG/001 and 001a], there is a gathering momentum to boost delivery at MKE sooner rather than later. **MM18** would remove the references to delivery post 2031, link delivery to strategic infrastructure provision and clarify the sequence of a development framework and subsequent planning permissions and I recommend it so that the Plan is justified, effective and positively prepared.

Employment and commercial role of MKE

117. Policy SD14 allocates MKE as a strategic site for a mix of uses including a variety of employment uses. The anticipated start date of 2023/24 would be a pragmatic approach. To aid effectiveness of Policy SD14, **MM18** would clarify that some 105 ha of employment land, for a mix of employment uses, would be released through the MKE allocation in Plan:MK and I recommend it accordingly.

118. I am satisfied that infrastructure planning to inform Plan:MK has appropriately considered the various infrastructure requirements. In respect of retail specific reference should be made to ensuring no adverse impact on the vitality and viability of Newport Pagnell district centre, which is only a short distance to the northern edges of MKE. **MM18** would do this and I recommend it for plan effectiveness and consistency with national policy.

Conclusions on MKE

119. The evidence of ongoing and potential funding options for infrastructure to unlock MKE justifies a more positively prepared approach than the submitted Plan:MK. In doing so, it would represent a sizeable addition to the land supply in a sustainable location. It would also not be prejudicial to future growth options. I have recommended the various modifications at **MM17** and **MM18** and on this basis MKE would be soundly based.

South Caldecotte

120. South Caldecotte would be the principal employment land allocation to meet the identified need for mainly warehousing and distribution uses. The site is a relatively unconstrained greenfield site and any localised environmental impacts relating to local priority habitats and species on the site could be mitigated in accordance with the requirements of policies NE2 and NE3 of the Plan. The Council has prepared and consulted on a Supplementary Planning Document (SPD) for the site which will provide more detailed guidance. This should be referenced in Policy SD16 and at paragraph 5.30 through **MM19** which would make clear that a comprehensive development framework for the site will need to be adopted by the Council prior to any planning applications being approved. This will ensure a coordinated and satisfactory approach to the development of this key gateway site and I recommend the modification for effectiveness.

121. The site would form a new gateway development when approaching the City from the south. This in itself, however, would not be necessarily harmful, particularly given the urban character of the adjacent 'Kelly's Kitchen' roundabout on the A5 and the potential of the Expressway in this area. As such the site would not be a significantly harmful intrusion into the countryside. The reasonably strong vegetation boundary around the site could be strengthened by additional landscaping to mitigate visual impacts.

122. Elsewhere the proposal would not adversely affect the setting of the Greensand Ridge. Due to the intervening distance and the densely wooded character of the Ridge, the setting of the scheduled monument at Danesborough Iron Age fort and the Listed Grade II* parish church at Bow Brickhill would also not be adversely affected. The South Caldecotte site would be visible from the well-used footpath extending south-west out of Bow Brickhill via London End Lane. However, the development would be seen at some distance over intervening fields, thus reducing the impact of the scale of warehouse and distribution units. The consideration of landscaping, design and building heights as required by Policy SD16, would address visual impact further such that the proposed development would not significantly harm the experience or outlook for users of this rural path.

123. It would be sufficiently separated from the main settlement of Bow Brickhill, although there are residential properties on Station Road that would be particularly close to the site. These properties are set back slightly from the highway and generally face south over open fields rather than towards the allocated site to the south-west. Through careful design and further landscaping the impact on nearby residential properties can be minimised.

124. The allocation would be principally accessed via the A5 although the option exists to connect to the A4146 to the north via V10 Brickhill Street and the level crossing. Taking account of the impact of EWR[11] queue lengths approaching the level crossing and mini-roundabout junction with Station Road, Bow Brickhill would be likely to increase but are unlikely to have a severe impact on highway safety. Longer term the proposed link through SEMK, including over the railway (modelled in MKMMM Scenario 2a) and the wider impact of the Expressway could potentially remove traffic from local

[11] Pages 136-139 of MK/TRA/004

roads to mitigate the moderate localised impact of South Caldecotte on queue lengths around the level crossing.

125. In terms of wider impacts on the local highway network, the MKMMM modelling shows only a modest impact above and beyond the effects arising from background traffic growth to 2031 including committed growth. The location of South Caldecotte, adjacent Bow Brickhill station, on bus routes from CMK and with potential connectivity to the nearby cycle network present significant opportunities to secure modal shift in the workforce. Concern is expressed about Heavy Goods Vehicles (HGVs) weaving through Bow Brickhill, Woburn Sands and Aspley Guise to access the M1 and A421 eastbound. This route is distinctly unappealing and convoluted compared to the existing dualled A4146/A421 to the north connecting to M1 Junctions 13 and 14 and the good A5 connection to the M1 Junction 11a to the south at Dunstable. In the short term a routing plan could be secured in accordance with Policy CT2 of the submitted Plan, so that HGV traffic uses the A5 to access site. Longer term the proposed Expressway would provide alternative east west connectivity.

Conclusion on South Caldecotte

126. For the reasons above the proposed employment allocation at this location would be soundly based and the allocation would be effective in meeting forecast economic growth in the early to middle period of Plan:MK.

Campbell Park

127. The area is demonstrably suitable and available (as evidenced through the dialogue with MKDP) for housing and is sustainably located close to services, facilities, employment and public transport. Plan:MK is therefore justified and effective in identifying Campbell Park for principally residential-led development as part of one the key areas for growth and change within CMK. Policy SD18 adds little to what is set out in Policy SD3 and should be deleted. Consequently, **MM14** and **MM20** would embed Campbell Park firmly into the policy framework for CMK without undue repetition and therefore make Plan:MK effective in this regard.

128. To aid transparency as to the scale of housing development proposed at the various parcels at Campbell Park, **MM6** would include capacities within Policy DS2 as part of the overall housing strategy of the Plan. This includes the sizeable quantum of development at Campbell Park Northside which could deliver around 1500 new homes and commercial uses. Additionally, it would be necessary through **MM42** to identify Land North of Glebe Roundabout, Overgate (60 dwellings) in terms of consistency with the Central Milton Keynes Alliance Business Neighbourhood Plan (CMKAP) so that the Plan is justified, effective and positively prepared.

Other Strategic Sites

129. Smaller strategic sites are proposed for allocation at Eaton Leys (Policy SD15), Milton Keynes Rugby Club (Policy SD20) and Redhouse Park (Policy SD21). These sites have specific issues which require a particular policy approach in the Plan. The policy content for these sites is sound. Policy

DS2 would allocate a number of non-strategic sites for housing which do not require specific policies. These sites were previously presented in Appendix A (table 18.2) of the Plan. **MM6** would list them within the policy and I recommend it for effectiveness.

Conclusion on Matter 4

130. The strategic sites would conform to the spatial strategy for Plan:MK and relate well to strategic and national east-west infrastructure delivery. The identification of these sites in the Plan will enable a comprehensive approach to the provision of sustainable development to meet the identified housing and employment needs within the Plan period.

MATTER 5 – Housing Land Supply

Issue 8 - Is the Plan's approach to land supply to meet the housing requirement positively prepared and effective?

Achieving a Deliverable and Developable Housing Land Supply

131. In the years 2016/17 and 2017/18 some 2,750 dwellings have been completed in the Borough resulting in a net shortfall of 784 dwellings against an annualised requirement of 1,766 dwellings. From an updated base date of 1 April 2018, the housing target in the Plan would be a minimum of 23,740 dwellings.

132. Whilst the submitted Plan is clear on the sources of supply and their aggregate capacity in meeting the requirement, the Plan was silent on a housing trajectory, the details of the key components of the trajectory and how a five year deliverable supply should be calculated. These omissions mean the submitted Plan would not be effective, positively prepared or consistent with national policy and therefore would not be sound.

Housing Trajectory

133. The submitted Plan at Table 4.3 would need factually updating to a latest base date of 1 April 2018 to reflect the up-to-date evidence, including the 2,750 completions in the first two years of the Plan period together with updating the pipeline of existing permissions and allocations (including the recently adopted SADPD) to 18,138 dwellings. Accordingly, as of 1 April 2018, some 20,888 dwellings over the Plan period can be accounted from completions and commitments anterior to Plan:MK allocations.

134. In terms of future sources of supply, various components should be amended so that future additional housing capacity as a consequence of Plan:MK would equate to 10,044 dwellings. This includes, amongst other things, making a minimum positive allowance for Milton Keynes East of 1,475 dwellings during the Plan period and being more positive about the capacity of sites in CMK and Campbell Park. Consequently, I recommend **MM8** which would provide a justified and effective Table 4.3, encompassing a blend of factual updates and other main modifications to the Plan. The upshot of revised Table 4.3 is that, with modifications, Plan:MK would enable the provision of 30,932 dwellings.

Key components of the proposed trajectory

(i) Existing commitments and allocations

135. Housing delivery in the short to medium term would be reliant on the continued delivery of existing strategic extension sites including the Strategic Land Allocation (SLA) in the 2013 Core Strategy. Both the expansion areas and Newton Leys are all being constructed at pace across multiple outlets. I also noted that housebuilding is now well-under way on initial phases at the SLA. The forecasts for these sites are robustly based.

136. A number of other urban sites are also projected to deliver, including within CMK. Through the SHLAA I am satisfied that the Council has taken an appropriate approach to intensification, applied reasonable densities and made realistic assumptions around delivery timescales, supported where appropriate by specific information. I am satisfied that the supply of sites in CMK and elsewhere in the urban fabric will contribute to housing delivery, diversifying supply to complement the strategic sites.

137. A number of neighbourhood plans have made residential allocations including in the key settlements at Newport Pagnell and Olney. Plan:MK does not seek to amend or conflict with these allocations. The made Newport Pagnell Neighbourhood Plan allocates land at Tickford Fields for 1200 homes. Following further delivery work to inform a planning application, the revised yield of the site is likely to be reduced to 930 units and initial completions moved back to 2020/21 [MK/EXAM/019]. The Council has amended its trajectory accordingly which is the sound approach.

(ii) Strategic Sites in Plan:MK

138. Land at SEMK is projected in the submitted plan to yield some 3000 homes over the Plan period. The Council envisaged delivery at the site from 2022/23 onwards. Notwithstanding the advanced dialogue between the Council and site promoters I consider that the further work needed on a development framework for the site (together with the announcement of a preferred route for the Expressway in 2020) means that on-site delivery should start from a modest output in 2023/24 and intensify from there onwards.

139. The trajectory shows annual delivery at 450-500 units over a sustained period towards the end of the Plan period. It is a greenfield site where strategic infrastructure requirements are known and it represents an alternative direction of growth for competition and choice in housebuilding. It is a scale of site that could sustain multiple development sites consisting of multiple outlets. It is an area well aligned to the forthcoming strategic east-west corridors and therefore likely to be one of significant demand. I am therefore satisfied the proposed build-out rates strike an appropriate balance between aspiration and realism.

140. Land at Milton Keynes East (MKE) was not prescribed any specific delivery within the Plan period. As set out elsewhere in this report, I consider a more optimistic view on infrastructure funding should be taken and accordingly a positive allowance given to the site of at least 1,475 units over the Plan period. I accept that should the current infrastructure funding bid be positive then delivery is very likely to be sooner rather than later and the 1,475 figure exceeded. The trajectory anticipates delivery starting in 2026/27 and outputting at around 300 units per annum. For similar reasons as set out above for SEMK I consider this a realistic profiling.

141. The various land parcels around Campbell Park, including the key site at Northside are under the control of the Milton Keynes Development Partnership (MKDP). Evidence to the examination [MK/EXAM/006a&b] submitted by MKDP shows selected national development partners and a collaborative project-managed approach with the Council to facilitate the start of delivery of 1,500 homes by 2020/21. Overall, I find the assumptions in the trajectory on delivery at Campbell Park to be realistic.

(iii) Urban Regeneration

142. Work is ongoing with preparing masterplans for specific older housing estates which may yield additional housing capacity. Additionally, whilst the Plan at Policy SD19 creates a positive framework for regeneration in central Bletchley no specific quantum of housing has been assigned in the trajectory. I also heard of interest for further housing within CMK, including higher density build-to-rent models. Again, the trajectory makes no allowance for these potential sources of supply. These options remain at any early stage such that for Plan:MK there is not yet the degree of 'reasonable prospect' outlined at paragraph 47 of the NPPF to be considered either deliverable or developable. As such the housing trajectory is reasonably cautious in not making an allowance for them at this stage.

(iv) Windfall allowance

143. The Borough has sustained a reasonable amount of windfall completions, averaging 186 dwellings per annum (2008-2018). Paragraph 48 of the NPPF allows for a windfall allowance and the Council's Housing Land Supply Topic Paper at section 7 provides the compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. In terms of making an allowance for small-scale sites, including smaller conversions, and excluding garden land, the proposed windfall allowance of 95 dwelling per annum would be justified.

Approach to the trajectory

144. In terms of profiling the trajectory, the Council has applied an annualised approach. Whilst there are a number of strategic urban extension sites (existing and proposed) which may point to an alternative stepped trajectory, it is noteworthy that both the SADPD and Plan:MK seek to genuinely diversify housing land supply to boost delivery such that I find the annualised approach sound.

145. The proposed trajectory peaks in 2021/22 at 3,450 homes after incremental increases in preceding years. I accept that this a very demanding figure and that the very recent Secretary of State decision at Newport Road[12] concludes that "something very special would need to materialise" to enable this to happen and that the overall estimate of deliverable land should be reduced in light of the 2018 NPPF definition of 'deliverable'. I accept that the trajectory is challenging but the strength of the local economy, ongoing infrastructure investment and the established number of larger sites now cumulatively outputting does point to special circumstances in Milton Keynes for significantly higher delivery over the next few years. The trajectory does rely to a certain degree on maximum outlets yielding at maximum capacities on the larger sites but also includes a significant number of small and medium sites contributing to the figures. I am not persuaded that further strategic land releases, would boost early delivery.

146. For the purposes of plan-making there is no dispute that MKC is a 20% authority which is reflected in the trajectory. I have been directed to a recent decision at Newport Road decision which has applied the 2018 NPPF definition of 'deliverable' but also finds MKC is a 5% authority which would make a material difference and a smoother trajectory. Ultimately, the trajectory in Plan:MK reflects the evidence tested against the 2012 NPPF as required under the transitional arrangements and consequently it would not be sound to take a selective approach from the Newport Road decision.

Conclusion on housing trajectory

147. The proposed inclusion of the housing trajectory after Policy DS2 and Table 4.3 of the submitted plan would clearly articulate the profile of planned housing delivery in the Borough together with a summary table transparently showing the contribution from key sources of supply. Proposed Appendix I to the Plan would provide a more detailed picture of delivery projections. Accompanying proposed text to the trajectory in the Plan would further explain how the annual target of at least 1,766 dwellings per annum would be delivered. Accordingly, **MM7** and **MM43** would ensure the Plan would be effective, positively prepared and consistent with national policy and I recommend them accordingly.

148. The housing trajectory shows a supply potential of 28,182 dwellings over the remainder of the Plan period, against a requirement of 23,742 (13 years plus shortfall since 2016). The Plan trajectory comprises an appreciable supply buffer in the region of 18%[13]. I note this is marginally contrary to the 15% marker in the submitted SA report on which larger sites and further provision was discounted. However, I see little significant harm from this scenario which would secure sustainable patterns of development without prejudicing longer term aspirations for transformational growth. Accordingly, whilst there is no requirement for a supply buffer, I find the positive margin in Milton Keynes would be justified, effective, positively prepared and consistent with national policy to significantly boost the supply of housing and therefore sound.

[12] APP/Y0435/W/17/3169314
[13] 28182 – 23742 = 4440. 4440/23742*100 = 18.7%

Five year deliverable supply of Housing Land

149. The starting point in the calculation is the annualised requirement of 1,766 dwellings per annum as per the trajectory. In terms of the shortfall that has accrued since the start of the Plan period (784 dwellings) the evidence on deliverable supply and the objectives of Plan:MK to support sustained growth means the Sedgefield approach to recover the shortfall within the five year period would be justified.

150. The Council does not dispute, based on past performance, that a 20% buffer should be applied (moved forward from later in the Plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market. In addition to various site-specific amendments to the trajectory, the Council has also applied a 10% non-implementation rate on completions within the first five years to those sites where delivery is envisaged to extend into year 5 to account for non-delivery and slippage. Taking all of these factors into account, there is a realistic prospect that there would be a five year supply of deliverable housing land on plan adoption as required by national policy.

151. For the Plan to be sound in terms of effectiveness and further consistency with national policy it would be necessary to introduce new text into the Plan so that future decision-makers would be clear on the basis as to how the housing land supply should be calculated. Text within **MM7** would do this and I recommend it accordingly.

Flexibility and Monitoring

152. Given the SHLAA evidence, the strong market demand in Milton Keynes and the context of significant future growth (and potential sources of funding to support growth), I find the risk of non-delivery to be minimal. To make the submitted Plan effective on de-risking housing delivery the Plan should set out the type of initiatives the Council will pursue to support housing provision including the preparation of development frameworks, planning performance agreements (PPAs), supporting funding bids and a practical approach to unlocking sites, for example using Compulsory Purchase powers. **MM7** would introduce such text to a new section of the Plan on housing delivery and I recommend it accordingly.

153. It has been suggested that further contingency should be made within Plan:MK through the identification of strategic reserve land should the Plan Review slip. Plan:MK identifies a healthy supply of housing and commercial land in excess of identified requirements. There is no need to identify contingency sites at this time.

Conclusions on Land Supply

154. With the proposed modifications identified, there would be an identifiable 5 year supply of deliverable housing land and a healthy supply of deliverable

and developable housing over and above the housing requirement, boosted further by the positive allowance for MKE. The degree of over-supply of housing land would nonetheless align with securing a sustainable pattern of development and appropriately add to the foundations for potential transformational growth of the City and the wider caMKox corridor.

MATTER 6: Central Milton Keynes, Retail and Leisure

Issue 9 – Is the approach to retail and leisure and Central Milton Keynes soundly based, locally distinctive and justified by the evidence?

Retail and Leisure Provision

155. The underpinning evidence in the Milton Keynes Retail Capacity and Leisure Study 2018 [MK/RET/001] is that, notwithstanding the vibrancy of retail and leisure offer, the growing population and the focus on reinforcing CMK as a local and regional destination, the forecast need for net additional retail floorspace to 2031 is down compared to previous forecasts to 2026. Accordingly, there is no immediate quantitative or qualitative need for additional food retail floorspace and only a modest quantitative need for further non-food retail floorspace at around 33,500sqm net[14] once existing commitments in CMK are factored in. The evidence points to further need for food and drink provision and commercial leisure such as health and fitness. Whilst there is some scepticism that the picture for future provision is not more positive there is very little robust alternative evidence to the Council's sound evidence on forecast need which meets the requirements of paragraphs 23 and 161 of the NPPF.

156. The over-arching strategy for retail and leisure development in Policy DS4 appropriately recognises the primacy and role of CMK and potential growth areas such as night time and visitor economies. In terms of the retail hierarchy required by NPPF paragraph 23, I find the combined approach in Policy DS4, Table 6.2 and Policy ER10 would define a justified and effective network of centres that accords with the recommendations in the Retail and Leisure Study and would therefore be sound.

Primary Shopping Area in CMK

157. Within CMK there is a distinction to be made between the city centre boundary and the primary shopping area (PSA) within it. The CMK City Centre boundary is generously drawn but on the whole justified in terms of consistency with the evidence base including the CMKAP. Plan:MK proposes to extend the previously adopted PSA to include the Xscape Milton Keynes complex to the south of Avebury Boulevard. The Xscape complex includes retail and food and drink provision on ground floor but from my observations it remains primarily a commercial leisure destination. In light of the relatively modest additional net need for non-food retail, the enlarged PSA may unintentionally serve to dilute efforts to reinforce the established retail core of the city centre. The proposed modification at **MM13** to revert the PSA back to the focused and established area previously identified in the

[14] Paragraph 16.4 MK/RET/001

Core Strategy would be necessary in order for the Plan to be effective and consistent with national policy and I recommend it accordingly.

Retail policies

158. In relation to the sequential test, Policy ER11 needs to be clearer that the starting point is the defined town centres. The policy as submitted also conflates to some degree both the sequential and impact tests with further ambiguity between the impact assessment on CMK and other centres. In light of the latest evidence[15] there is also an up-to-date justification for lowering the threshold for the impact test on the city centre from the 2500sqm in the NPPF to a threshold of 900sqm gross. **MM21** would introduce the required changes and I consider it necessary for the Plan to be justified, effective and consistent with national policy.

159. The NPPF at paragraph 23 explains that Local Plans can define primary and secondary frontages and set policies which make clear which uses will be permitted in such locations. Policy ER19 and accompanying Table 6.3 of the Plan seek to manage the proportions of non-retail uses in town centres. It is recognised that the dynamics of town centres are changing but shopping must remain one of the core functions. As such Plan:MK would be justified in seeking to positively manage retail provision in the Borough's city centre and town centres. The Plan needs to be clear that non-retail uses are those outside of Use Class A1 of the 1987 Use Classes Order (as amended) in order to be effective. The Plan also seeks to limit continuous frontages of 3 or more units in non-retail use but in the context of seeking to secure a vibrant range of main town centre uses I find there is very little justification for the particular threshold and as such it would not be justified. To address these soundness issues **MM22** would introduce necessary comprehension to Policy ER19 and I recommend it accordingly.

160. To the east of Milton Keynes is the Kingston Centre (a defined town centre in Policy ER10) where Table 6.3 to Policy ER19 seeks to resist the loss of A1 retail uses in the primary frontage. The Kingston Centre is anchored by a large food/household store but has a particularly strong food and drink offer and elements of leisure. The particular circumstances at the Kingston Centre point to a more flexible approach such that the particular restriction on non-A1 uses in the primary frontage would not be justified. **MM23** would modify Table 6.3 correspondingly and I recommend it for soundness.

The Strategy for Central Milton Keynes

161. Whilst retail, commercial leisure, entertainment and culture will remain pivotal to the future role of CMK over the Plan period, it is necessary for soundness that Plan:MK positively addresses the significant potential for other uses across what is a substantially sized, strategic and highly sustainable location.

162. In doing so, it is important to recognise that Plan:MK does not start with a blank piece of paper. CMK is a highly planned, modern environment with its own distinctive character and aesthetic which will inform future

[15] Paragraph 16.64 of 2018 Retail Capacity and Leisure Study

development. Despite good levels of investment there are a number of prominent development sites that remain moribund. At a time of significant development needs, that is a situation which cannot persist. As such it is justified to revisit the approach for CMK. In broad terms, I am satisfied that Policies DS1, DS2, DS3, DS4, SD2, SD3 and SD4 provide an appropriate strategic framework for a mix of uses in this key area but there are particular matters of soundness where modifications would be required, which I address below.

163. In considering the planning context of CMK it is the only city centre that benefits from a made Business Neighbourhood Plan through the CMKAP (2015). Whilst both Plan:MK and CMKAP recognise that there are significant opportunities to accommodate further development in CMK there are some notable differences. Matters have materially changed since the CMKAP was prepared against the context of the 2013 Core Strategy. The up-to-date, detailed evidence now points to the need for a more realistic view about the scale of additional retail development, and a more flexible view on other town centre uses. Plan:MK does not underestimate the retail and leisure potential of CMK and proposed modification **MM14** to Policy SD3 to reduce the non-food retail floorspace in the CMK PSA to 33,490sqm would be justified and therefore I recommend it for soundness.

164. There would be a degree of conflict on the retail definition of 'edge of centre' between CMKAP and Plan:MK with the former applying a wider approach west from the PSA and Plan:MK applying the 300 metre definition in the NPPF. Having regard to the 2018 Retail Study I see no locally justified reason to deviate from national policy and the 300 metre buffer from the PSA for retail purposes would be sound in a CMK context.

165. In terms of employment, the latest evidence base underlines the significant potential for the knowledge-based sector. CMK offers a highly sustainable location for additional office and other high density employment. Plan:MK identifies a central business district to the east of the railway station which would be highly accessible and reflect an existing nucleus of city centre employment developments. This approach through Policy SD2 would be justified, effective and therefore sound. The latest evidence on the need for office floorspace has been revised down slightly to 110,000sqm but I do not consider it unduly prescriptive for Policy SD3 to set this growth target through **MM14**, and I recommend the revised floorspace figure for justification and effectiveness.

166. Allied to this is a proposal for a higher education facility which is presented as the Milton Keynes University campus or MK:U. Plan:MK specifically identifies Block B4 within CMK and such an approach would accord with the evidence in the MK Futures 2050 Commission Report 'Making a Great City Greater', as one of the six big projects. The project is moving forward with Cranfield University appointed as the lead Higher Education partner in March 2018. Policy SD3 would benefit from some specificity that it is Block B4 that is allocated for further and higher education uses and I recommend this aspect of **MM14** for Plan effectiveness.

167. CMK is already the home to many residents and it is appropriate for Plan:MK to consider underutilised areas as well as maximising the potential of existing developments for additional homes. The proposed focus on residential-led development around Campbell Park would be at odds with the CMKAP vision and policies for this area but the way forward for the Campbell Park area over the Plan period needs to be deliverable. In light of the evidence for Plan:MK on employment and retail needs and the recent expiry of outline planning permission for office development at Campbell Park[16], I am not persuaded that there is sufficient demand for such a breadth of commercial floorspace across the city centre to positively reserve or allocate the Campbell Park area for such uses. Accordingly, Policies DS1 and DS2 are justified and positively prepared in identifying CMK (including Campbell Park) as part of the spatial strategy to deliver much needed homes in the City. Policy SD2 is also sound in supporting the principle of residential development as part of the strategy for CMK.

168. Various amendments to Policy SD3 are proposed in **MM14** including increasing the potential housing capacity in CMK from 1,900 to 3,535 homes, specifying the various development blocks around Campbell Park which would be primarily residential-led and clarifying the retention of the park and the need to maintain its setting. With the additional text on Campbell Park in Policy SD3, **MM20** would delete Policy SD18. **MM12** would clarify what 'primarily residential-led' would mean at Campbell Park and the sorts of ancillary uses that would be acceptable. These various alterations to the Plan would be justified and would make the Plan effective and positively prepared and I recommend them accordingly, although I have amended the wording slightly to **MM12** to make clear that the scale of any retail at Campbell Park would be for local need only.

169. Elsewhere within CMK, specific housing allocations are identified on larger sites including Block D3.4 (250 dwellings) and on the former Food Centre site as part of a mixed use redevelopment scheme (298 dwellings). In principle, based on the evidence in the SHLAA and Retail Study, I find the proposed residential allocations in CMK, including land east of John Lewis Car Park (93 dwellings) would be soundly based.

170. The CMKAP places significant emphasis on the contribution of "classic CMK infrastructure" to the character and heritage of CMK (including Campbell Park) and seeks to only contemplate the alteration of this infrastructure in exceptional circumstances. Given Plan:MK is setting a new strategic framework for CMK to 2031 in the context of higher growth requirements, there will inevitably need to be some flexibility to make efficient use of sustainably located urban land (as per the recent Intu:MK decision [MK/RET/004]). Accordingly, I am not persuaded that Plan:MK should strategically identify "classic CMK infrastructure" and an appropriate balance needs to be struck particularly if moribund areas within the city centre are to be developed and rejuvenated. I find Plan:MK sets the right strategic tone in terms of seeking improvements to the quality of the environment and public realm in CMK (Policies DS4 and SD2) and accommodating significant new levels of growth and change (Policy SD3).

[16] Reference 04/00586/OUT

Conclusions on Matter 6

171. Given the significance of CMK to the sustainable growth of the Borough over the Plan period and the potential of CMK to be a dynamic and centrally positioned hub on the wider caMKox corridor it is appropriate and justified for Plan:MK to revisit and set the strategic planning framework for this core area. In terms of the relationship with the CMKAP, as set out in the NPPF at paragraphs 184 and 185 it is for Local Plans to set the strategic needs and priorities. I consider the combined policy approach in Policies DS1, DS2, DS3, DS4, SD2, SD3 and SD4 in Plan:MK reflects the latest evidence and so provides sufficient certainty on the strategic direction for CMK to enable future investment at this strategic location.

MATTER 7: Infrastructure and Viability

Issue 10 - Is there a reasonable prospect that infrastructure will be delivered in a timely fashion to support the planned growth and needs of existing and future residents and businesses?

172. Work to scope and cost the infrastructure to support the delivery of Plan:MK was initiated through the MK Local Investment Plan (LIP) process [MK/INF/001]. There is also the wider SEMLEP Infrastructure Investment Plan (IIP) [MK/INF/005] which is reflective of the growth emerging through the current round of Local Plans. At the time of Plan submission these two documents provided a good starting point on the key strategic infrastructure required, likely costs and potential funding gaps.

173. During the examination, work on infrastructure planning progressed into an Infrastructure Delivery Plan (IDP) June 2018 [MK/EXAM/004] recognising that the £400million funding gap initially identified in the LIP[17] required updating to reflect Plan:MK together with prioritisation and project assessment. The IDP identifies that some £500million of capital investment will be needed to bring forward planned and committed major sites and allocations. The IDP is a 'live' document which will evolve and be updated.

174. Both the Council's IDP and the SEMLEP's IIP identify transport, utility projects, education and green infrastructure, amongst other things, as key areas for infrastructure investment to support sustainable growth. Regional infrastructure projects which affect Milton Keynes, include EWR, the Milton Keynes-Bedford Waterway project and the dualling of the A421 from M1 Junction 13 to the edge of Milton Keynes. More locally, SEMLEP IIP identifies funding needed to facilitate MK:U (in CMK) and support additional secondary school provision at strategic growth locations in the City.

175. For the strategic sites in Plan:MK the requirements in Policies SD11 and SD12 for a development framework will involve further detailed infrastructure planning and assessment of phasing. However, for the purposes of plan-making it is evident, that in broad terms, there are no infrastructure 'showstoppers' for the planned growth. In particular, the IDP sets out the known infrastructure requirements, costs, delivery dates and delivery leads for MKE and SEMK respectively. The proposed MMs to the

[17] Paragraph 7.13.7 of MKC Statement for Matter 7

individual strategic policies for both SEMK and MKE at **MM15** and **MM18** respectively provide further correlation with the updated IDP to make the Plan effective.

176. Overall, the infrastructure evidence informing the Plan is consistent with NPPF paragraph 162 which requires amongst other things a cooperative approach on understanding forecast demands against existing capacity. It also accords with NPPF paragraph 157 which requires Local Plans to plan positively for the infrastructure required. The Plan and the evidence, notably the IDP, are also consistent with PPG paragraph 12-018-20140306 in terms of demonstrating what infrastructure is required, who is going to provide it and how it relates to the anticipated rate and phasing of development.

Connectivity

177. The design and standard of the Borough's road network is demonstrated through the MKMMM to be reasonably resilient to future growth. The modelling confirms that proposed growth in Plan:MK would only modestly add to delays likely to occur in any event over the period to 2031. Accordingly, the highway capacity issues arising from Plan:MK's proposals would be generally localised to junctions relative to the proposed sites.

178. A key task for Plan:MK is to support the Council's Mobility Strategy 2018-2036 (LTP4) [MK/TRA/001] to facilitate a combination of both modal shift and new transport technologies to ensure the growth of the City can sustainably occur including contributing to the need to address climate change as well as improving the general well-being of its citizens. Strategic Objective 12 and the transport polices in Section 8 of Plan:MK respond positively to the task in hand. Importantly, the Plan's proposed strategy would result in a sustainable pattern of development capable of positively contributing to modal shift of 5-10% through maximised travel choices and new transport technologies. The Plan also seeks to deliver an effective transport network including infrastructure for public transport, extending an attractive and safe cycling and walking network including the segregated Redway network and supporting a transition to electric vehicles.

Transport modelling

179. Plan:MK is underpinned by the updated MKMMM [MK/TRA/004] which is a strategic highways and public transport model. Highways England has confirmed that the MKMMM satisfactorily tests the impacts of the spatial strategy in Plan:MK on the strategic road network[18].

180. Concern is expressed that the impacts of Plan:MK on the road network cannot be fully understood because other than development at South-West Milton Keynes (in Aylesbury Vale) no other specific neighbouring development has been factored in, instead the modelling relies on generic NTEM projections. The principal concern relates to growth in Central Bedfordshire. From the evidence before me, including under the DtC, there

[18] Paragraph 3.3, pages 46-47, MOU between MKC and Highways England 22 March 2018

is sufficient awareness of plans and proposals, recognising that neighbouring plans have come forward at different timescales to Plan:MK. In relation to proposed growth in Central Bedfordshire there is a commitment to dual the A421 from the M1 Junction 13. The modelling undertaken by MKC has taken account of congestion and delay at Junction 13 of the M1 and the A421 from the M1 to the borough boundary[19].

181. I find the broad scenarios assessed in the MKMMM provide a reasonable basis for sensitivity testing the impacts of possible growth. The outputs of the MKMMM reveal that congestion and delay to the network in 2031 that would be attributable to Plan:MK proposals are relatively small and localised to junctions in close proximity to the proposed strategic sites. Where this affects the strategic road network Highways England agree that the impacts are not insurmountable and can be managed through a range of transport and highway interventions. Additional specific mitigation, in line with the MK Mobility Strategy would be developed for the strategic sites through the development frameworks and would involve strategic transport bodies where relevant.

182. In relation to the proposed strategic sites, further detail on mitigation measures has been produced including a technical note on MKE[20]. The baseline MKMMM report of November 2017 appropriately considers the development scenarios as they relate to SEMK (north and south of the railway) and at South Caldecotte (cognisant of the A5 Kelly's Kitchen junction proposals in document INS1c). Whilst much remains to be clarified through subsequent development frameworks for the strategic sites, the MKMMM [documents TRA/002/ 003 and 004] meets the proportional evidence base for plan-making required by NPPF paragraph 162.

183. The MKMMM may well represent a worse-case scenario given the modelling does not generally assume or build-in the implementation of the Mobility Strategy[21]. In Milton Keynes, the ambitions for modal shift are realistic reflecting the current low base in public transport patronage and walking and cycling and the potential to upgrade and extend infrastructure for non-car based travel. Additionally, there is credence that MKMMM underplays the potential of EWR to improve rail mode share. Consequently, whilst committed growth is likely to increase average journey times across Milton Keynes by 14% in the AM Peak and 15% in the PM peak, overall, the road network will experience limited congestion (in comparison to other similar urban areas) irrespective of the potential for modal shift to add resilience to the local road network.

Green Infrastructure, including open space

184. Despite some urban densification and additional peripheral development Milton Keynes remains a remarkably verdant city[22] with its high quality green space evidently one the key factors that makes the City an attractive

[19] MKMMM update in document INS1c, prepared by AECOM, dated 24 April 2018
[20] Examination Document INS1d – AECOM Technical Note dated 24 April 2018
[21] Paragraph 6, Transport Topic Paper
[22] 30% of total city area is green infrastructure (Public Open Space: Management Framework for MK [MK/ENV/012])

place to live and work. The "Forest City" and linear park concepts remain key components of planned growth and are embedded in Policies SD11 and DS6 respectively as part of the wider requirement for coherent landscape and open strategies as part of major new developments. Elsewhere the Plan seeks public open space provision at Policy L4 in accordance with clear standards at Appendix C of the Plan. I find the broad approach to securing additional open space provision to be effective and justified.

185. In terms of delivering and maintaining additional open space and publicly accessible green infrastructure going forward it is reasonable that there is some flexibility in Policy L4 recognising that maintenance should be long term, costed and financially sustainable. It is not necessary for soundness for Policy L4 to be more specific in these matters through further prescribed standards including those of the Milton Keynes Parks Trust.

186. Whilst the Parks Trust is well-placed and well-regarded to provide open space management, the omission of other options for long term stewardship of open space would not be justified. The Council's Public Open Space: Management Framework for Milton Keynes [MK/ENV/012] refers to "partners" in terms of the collective management of open space in the Borough including the Parks Trust but also Town and Parish Councils and other suitable bodies. There is no compelling evidence before me that only the standards of the Parks Trust would provide an appropriate benchmark for green infrastructure and open space stewardship and that other maintenance options would undermine the character of Milton Keynes or reduce public access to open spaces. The Parks Trust is identified in Policy SD12 as one of the specific bodies to be engaged with when preparing development frameworks for the strategic sites.

187. Broadly, Policy L4 is aligned with the NPPF at paragraphs 57 and 114 in reflecting the importance of open spaces in successful place-making. However, to make Policy L4 effective it should refer to green infrastructure as well as open space and highlight the Parks Trust as an example of the sort of responsible maintenance body that the Policy is seeking for the stewardship of public open space on new housing development. **MM37** would do this and I recommend it accordingly.

Is Plan:MK viable and therefore deliverable?

188. The Plan is supported by an up-to-date plan-wide viability study prepared by AECOM & HDH Planning and Development [MK/INF/006]. The assumptions informing the appraisal were tested through stakeholder engagement in August 2017 involving a notable number of land promoters, developers, registered social landlords and public bodies with an interest in Plan:MK and the local development market more generally. This provides a degree of confidence to the appraisal outputs including the critical threshold land value which in the case of peripheral greenfield sites is broadly 30 times existing use value[23].

[23] MK/INF/006 paragraphs 6.34 – 6.43

189. The appraisal assesses the effect on the viability of development of the plan's cumulative policy requirements. A number of representative residential and non-residential typologies have been tested. In my view there are no significant omissions in the approach or coverage of the plan-wide viability study which clearly shows that development within CMK, the high value flanks around the urban area of Milton Keynes and the rural areas would be viable.

190. The plan-wide viability study's advice on the build-to-rent sector[24] is that it cannot viably deliver affordable housing. However, I am cautious that a residual land value model may well struggle to capture the intricacies of a build-to-rent scheme, particularly given the very few examples in Milton Keynes. In my view a precautionary approach is required and exempting this sector would not be justified. Whilst Policy HN1 supports a mix of housing including tenures, I am not persuaded that built-to-rent housing schemes would be critical to delivery of the Plan and thus the affordable housing requirement in Policy HN2 for the sector would put the Plan at serious risk. As such I consider Policy HN2 to be justified and consistent with national policy to seek, as a starting point, an affordable housing contribution and apply the standard viability pressure valve in part B of the policy where circumstances justify it.

191. In respect of the inputs for the optional technical standards (part 2 of Policy SC1) and for carbon reduction measures, Table 8.1 of the plan-wide viability study summarises the key inputs. These are unlikely to put the delivery of the Plan at risk given the sensitivity testing in the plan-wide viability study shows that most typologies of development in locations key to the delivery of the strategy have a significant viability cushion[25]. To provide a safeguard to Policy SC1 on water efficiency costs, the standard caveat of being subject to viability should be added to the policy. **MM41** would do this, although I have amended the wording slightly to ensure effort is maximised, and I recommend it for effectiveness.

Infrastructure Delivery

192. Since 2007 the Council has successfully operated the Milton Keynes (MK) Tariff as a charge per property or area of commercial land. However, it is recognised that due to pooling restrictions the MK Tariff will no longer operate and the principal mechanism going forward will be Planning Obligations under Section 106 of the 1990 Act. The Council confirmed that it is not the current intention to pursue a Community Infrastructure Levy. Policy INF1 makes clear that new development will need to mitigate impacts on infrastructure through a Section 106 mechanism. The plan-wide viability study demonstrably shows that a £20,000 per unit S106 cost in addition to affordable housing and other policy requirements would be viable. Further detail will be provided in a Planning Obligations SPD and the wording of Policy INF1 is consistent with NPPF paragraph 153 in this regard.

Conclusion on Matter 7

[24] MK/INF/006, paragraph 10.70, page163
[25] MK/INF/006 paragraph 12.15

193. In conclusion there is a reasonable prospect that the growth will be achievable within the planned timescales. Some funding opportunities are available for the infrastructure identified and getting Plan:MK in place will provide valuable certainty to progress various funding submissions. Overall, the viability assessment of the Plan satisfactorily demonstrates that the cumulative impact of the Plan's policies and requirements would not put the viability of the Plan as a whole at serious risk. The viability evidence accords with NPPF paragraphs 173-177 and demonstrates that there would be a reasonable prospect that necessary infrastructure would be delivered in a timely fashion.

MATTER 8: Policies for Managing Development

Issue 11 – Are the proposed policies for managing development soundly based and capable of securing sustainable development?

194. A number of soundness matters relating to employment and retail development management policies are dealt with separately under Matters 3 and 6 respectively as set out above.

Housing Policies

195. The whole plan viability study has sensitivity tested a number of scenarios and demonstrates that sites of 11 units or more can viably deliver 31% affordable housing. The 31% requirement, when applied to the land supply allocated and identified in Plan:MK, would deliver the identified need for affordable housing provision. As submitted Policy HN2 required at least 31% and generally no more than 50% on such sites. Whilst well-intentioned, this is too ambiguous and as such the Policy would be ineffective and unsound.

196. Policy HN2 needs to be modified to make clear that qualifying sites should provide 31% affordable housing provision as supported by the SHMA and Plan-wide viability study. This would provide a clear policy requirement. Where proposals provide more than 31% it would be sound for the policy to express support, given the need for varying forms of affordable accommodation. **MM24** would re-structure the opening section of Policy HN2 along these lines and I recommend it so that the Plan would be justified, effective and positively prepared.

197. Elsewhere the policy needs to clarify that discounted market rent is 80% of market rents or the Local Housing Allowance rates (whichever is the lowest) rather than the 31% of gross household income as submitted. **MM24** would also make this change and I recommend it for effectiveness. Part C of the policy seeks a contribution for affordable housing from Build-to-Rent schemes. Given the paucity of specific viability evidence for the sector, some flexibility is required to recognise discounted market rent is the starting point and would be subject to viability considerations (Part B of the policy) and consideration of alternatives such as financial contributions for off-site provision. Again **MM24** would introduce appropriate changes to Part C of the policy.

198. The submitted Plan:MK strongly supports self-build and custom-build housing in accordance with NPPF paragraph 50 and the SHMA (paragraphs

5.71 to 5.78). From the Council's register and annual monitoring the demand for self-build and custom-build is relatively modest but demand may grow over time. As submitted Plan:MK looks to allocations within the Plan to make provision for serviced plots of land but I find this approach lacks detail so as to be effective.

199. The Council proposes to modify Policy HN5 to specify that the strategic growth areas (Campbell Park, SEMK and MKE) and any proposals for further strategic residential development, will be required to provide 1 hectare for serviced plots. This would make a reasonable and proportionate contribution to the supply of serviced plots. Additionally, it would be unreasonable for such provision to be maintained in perpetuity if demand is not there or does not translate into actual delivery. Accordingly, Policy HN5 needs to set out the Council's approach for those circumstances under which it would consider the release of undeveloped self-build plots. **MM25** would make the appropriate changes to address both of these issues and I recommend it accordingly for plan effectiveness.

200. Policies HN11 and HN12 would, on the whole, provide an appropriate policy framework for managing gypsy and traveller and travelling showpersons proposals, including windfall development outside the allocated sites, as required by the PPTS. As submitted Policy HN11 requires gypsy and traveller proposals not to be prominent from public vantage points. To make the policy justified, criterion vii) should be deleted and I recommend **MM26** accordingly.

201. Policy HN4 sets out that all residential proposals (Use Class C3) would be required to meet the optional technical standards in respect of Nationally Described Space Standard (NDSS). As required by the PPG (paragraphs 56-005 to 007-20150327), the Council has undertaken a recent NDSS study [MK/HOU/002] with reference to the housing mix sought by the SHMA. The greatest demand is for 2 and 3 bedroom dwellings, where recent performance against the NDSS in the Borough is generally poor. This in itself is a strong indicator for the need to introduce the NDSS. Moreover, the ongoing growth agenda in the Borough, and move towards the vigorous rates of housing growth envisaged to 2050, needs to be on the basis of high quality design and a good standard of amenity for all occupants of buildings (NPPF paragraph 17). The NDSS has been considered as part of the Plan-wide viability study [MK/INF/006]. Overall, I find the policy requirement seeking the NDSS to be soundly based in Plan:MK.

202. Policy HN4 also requires 60% of market and affordable dwellings to be built to the optional M4(2) accessibility and adaptability standard, 5% of market dwellings to be capable of being readily adapted[26] to M4(3) wheelchair accessible standard and 10% of all new affordable housing to be built to M4(3) wheelchair accessible standard. Households with specific needs are considered in some detail in the SHMA (paragraphs 5.89 to 5.108). Through a combination of ageing population profiles (particularly the forecast growth in the over 65 and over 85 cohorts) and general data on the proportion of households with wheelchair users the proportions sought by

[26] My emphasis.

Policy HN4 would be justified, particularly as society looks to accommodate people in their own homes for longer. Again, the implications of this part of Policy HN4 have been viability tested as required by PPG. Overall, I find the policy to be soundly based in Plan:MK.

Sustainable Construction (Policy SC1)

203. The Borough is within the Ruthamford South Water Resource Zone where a combination of high population density and relatively low rainfall means the zone is already classified as being in severe water stress. Over the next 25 years it is predicted that the zone will be in deficit by 2039-40[27]. Consequently, in addressing future water supply resilience a high degree of water use efficiency will be necessary. On this basis the optional technical standard in relation to water usage at 110 litres/per person/per day would be justified and consistent with national policy. The cost of implementing the standard has been factored into the viability study and the figures used accord with data provided by Anglian Water which I consider to be robust.

204. Policy SC1 also requires developments of 11 dwellings or more or commercial floorspace of 1000sqm or more to demonstrate that the proposal would achieve a 19% carbon reduction improvement upon the requirements in Part L of the Building Regulations and to provide on-site renewable generation or a connection to a renewable or low-carbon community energy scheme that contributes a further 20% reduction in the residual carbon emissions subsequent to the 19% carbon reduction. Some matters relating to the standards and performance of new buildings have moved on since the NPPF was published and I have been referred to the enactment of the Deregulation Act 2015 which seeks to revoke elements of the Planning and Energy Act 2010. That said, not all parts of the Deregulation Act have been implemented such that it remains justified, given the scale of housing growth and the continuing need to tackle climate change for Plan:MK to expect new developments to support the move to a low carbon future though energy efficiencies. The viability of Policy SC1 has been assessed on an average offset payment currently secured under Policy D4 of the development plan. Overall, I find Policy SC1 to be sound.

Design Policies

205. On submission, the Council has sought to include an additional policy requiring a proportion of innovative design and construction on proposals of 50 dwellings or more to continue to evolve the unique character and heritage of Milton Keynes as a location where contemporary domestic design has been fostered and encouraged. This aligns with the Council's adopted Creative and Cultural Strategy and the ongoing MK Futures 2050 work around testing new designs to boost housing delivery.

206. However, I do not consider the submitted Plan to be unsound in terms of its overall approach to design quality. Furthermore, to require larger developments to include innovative design in the absence of viability testing

[27] Water Resource Management Plan - Anglian Water Services 2015

and the outputs of the ongoing MKFutures 2050 Strategy would not be justified. I therefore recommend that the only way to retain Policy D4 in the Plan would be to remove the requirement and express the policy in terms of being supportive of innovative design until the evidence base is sufficiently advanced to inform any update to policy in the Plan Review. I therefore recommend **MM38** and **MM39**, which would introduce new Policy D4 and supporting text respectively, subject to the amendments I have outlined.

Hot Food Takeaways

207. The PPG at paragraph 53-006-20170728 states that, where supported by an evidence base, local plan policies can be brought forward which limit the proliferation of certain use classes in identified areas as part of creating a healthier food environment. Policy EH8 of the submitted plan seeks to do this by restricting hot food takeaways within close proximity of primary and secondary schools in the Borough. I recognise that there is a broad spectrum of evidence on the causes of childhood obesity and differing research and commentary on the correlation between overweightness and obesity in children and the proximity of takeaways to schools. However, in terms of the PPG, I consider it reasonable and justified to consider hot food takeaways and whether, as a certain use class, they promote access to healthier food consumption choices.

208. In this regard I look to recommendations from Public Health England[28], referenced by the Council, which advise that part of the solution in addressing child obesity would be to restrict hot food takeaways within walking distance of schools. The PPG at paragraph 53-006-20170728 specifically references proximity to locations where children and young people congregate such as schools as being an issue to have particular regard to when enabling a healthier food environment.

209. At the time of plan submission there was little to doubt that reducing child obesity is a key local action for the Council and other health partners as demonstrated through the MK Joint Health and Wellbeing Strategy 2015-2018 [MK/COM/007]. Specifically the Health Inequalities 2015 Report [MK/COM/008] identifies as an action, amongst other things, that fast food restaurants should be restricted near schools. The Council's Public Health team prepared an additional paper in terms of the health context and the prevalence of overweightness and obesity which shows a higher incidence in Milton Keynes compared to regional data and rising levels of overweightness and obesity in the Year 6 cohort (start of secondary school). In my view the local evidence supports the need to manage the further proliferation of hot food takeaways near to schools. I am also satisfied that it would form a proportionate part of a wider package of coordinated actions to tackle child obesity and overweightness in the Borough involving the Council, Clinical Commissioning Groups and local voluntary and physical activity groups. I therefore find, that in principle, Policy EH8 would be justified and consistent with national policy, including the NPPF at paragraph 17.

[28] Health Matters: Obesity and the food environment (March 2017)

210. The policy applies a 400 metre restrictive distance from primary and secondary schools on the basis of a 5 minute walking distance. In order to be effective and given the scale of some school sites the policy needs to specify that the 400 metres would be measured from the main school entrance and applied against the most logical walking route. **MM27** would introduce this practical clarification and I recommend it for effectiveness.

211. I am mindful that hot food takeaways are a lawful use and the consequence of the policy should not be to introduce a blanket ban on additional takeaways in the Borough. Mapping has been produced to show the spatial effect of Policy EH8. Whilst some town and local centres would be affected, large parts of the Borough, including CMK, would not be and as such Policy EH8 would not represent a moratorium. Additionally, some flexibility needs to be applied to the Council's mapping to recognise concentric buffers may not always equate to the most logical walking route. To assist users of the Plan and to make the document more effective, mapping should be included within the document with additional text on the application of the 400 metre distance. **MM45** and **MM28** would do that respectively and I recommend both for plan soundness.

Natural Environment Policies

212. Policy NE1 sets out the over-arching approach to the protection of sites with a nature conservation and geological interest. As submitted the policy is unclear on the role of adequate mitigation as part of an appropriate hierarchy to conserve and enhance biodiversity. It would be appropriate also, in the context of Milton Keynes and the identified larger scale biodiversity opportunity areas, to aim to achieve a net gain in biodiversity through development proposals over the Plan period. Allied to this Policy NE1 as submitted could be clearer on those sites which fall under the umbrella of being of county-wide or local nature conservation and geodiversity importance and reference them as being shown on the Policies Map. Consequently there are issues with the policy in terms of effectiveness and consistency with national policy. **MM31** would directly address these issues and I recommend it accordingly for plan soundness.

213. Protected species, priority species and habitats are addressed in Policy NE2. For consistency with paragraph 117 of the NPPF and for effectiveness, the policy needs to be clearer that the objective is to promote the preservation, restoration and re-creation of priority habitats and the protection and recovery of priority species. **MM32** would do this and I recommend it accordingly.

214. As submitted Policy NE3 requires greater consistency with paragraph 118 of the NPPF in terms of the hierarchical approach where significant harm cannot be avoided. The Plan also needs to be effective in ensuring the impact on biodiversity is assessed at an appropriate level. **MM33** would address the consistency with national policy and introduce a clearer threshold that developments of 5 dwellings or 1,000sqm must undertake a biodiversity impact assessment (using either the Defra metric or an alternative locally approved metric). Given the significance of conserving and enhancing the natural environment as a strategic objective of Plan:MK

and within the NPPF I consider the threshold justified. For these reasons, so as to ensure plan soundness, I recommend **MM33**.

215. In order to be justified and effective Policy NE4 needs to refer to Green Infrastructure Opportunity outputs and mapping prepared by the NEP in terms of making the fullest potential of the opportunities to extend and enhance a green infrastructure network including ensuring that such infrastructure is strategically planned (including the proposed extensions of linear parks). The policy would be effective were it to refer to the multi-functionality of green infrastructure provided there would be no negative impact on the ecosystem value of such spaces. **MM34** would address these points and result in an effective and strengthened policy on green infrastructure and I recommend it for plan soundness.

216. The Borough contains areas of best and most versatile agricultural land (defined as grades 1,2 and 3a of the Agricultural Land Classification). Sustainably located growth over the Plan period will require greenfield land and the submitted Plan's omission on the need to take this resource into consideration means the Plan would not be effective or consistent with paragraph 112 of the NPPF. An additional policy (Policy NE7) and associated text would address this and **MM35** and **MM36** are necessary for consistency with national policy.

Flood and Water

217. The Plan is supported by an up to date Water Cycle Study [MK/FLO/002] and Strategic Flood Risk Assessment (SFRA) [MK/FLO/003]. Policy FR1 needs to be clearer that development proposals take the opportunities to reduce the causes and impacts of flooding to the site and surrounding area (including taking account of climate change) and that as a minimum demonstrate that there would be no increase in flood risk to the site or surrounding area. **MM29**, amongst other things, would do this and I recommend it for effectiveness and consistency with national policy. Policy FR2 deals with sustainable drainage systems (SUDS). In a Milton Keynes context the policy would be justified by including references to the environmental and biodiversity value of SUDS capacity, including existing floodplains and the need to maintain and enhance the natural capabilities of watercourses and habitats to accommodate flood waters. In order to be effective, Policy FR2 needs to cross reference the bodies likely to be responsible for SUDS and ensure that SUDS proposals in themselves do not harm the function and setting of local watercourses. **MM30** would address these points and I recommend it for Plan effectiveness.

Heritage

218. I am satisfied that the comprehensive content of Policy HE1 and the baseline at Appendix B of the Plan provides the positive strategy for the conservation and enjoyment of the historic environment and the clear strategy for enhancing the historic environment required by paragraphs 126 and 157 of the NPPF respectively. Conversely, I am not persuaded that Policy HE1 should be supported by component development management policies to deal with heritage assets on a constituent basis. As submitted,

Policy HE1 is justified, effective, positively prepared and consistent with national policy.

Per Cent for Art

219. Public Art has been an integral part of the character of Milton Keynes as a new town and is now an established part of the City's heritage. 'Milton Keynes: The Creative and Cultured City' is one the six big projects in the MK Futures 2050 Commission Report. Consequently, it is justified that new developments, and in particular, the proposed strategic sites, continue to positively contribute to the character of this modern city through the tradition of public art. An appropriate allowance at 0.5% of capital costs has been factored into the whole plan viability assessment and would demonstrably not put delivery of the Plan, as a whole, at risk. For the purposes of soundness Policy CC1 would need to be modified to make clear the contribution sought applies to proposals of 11 dwellings or 1,000sqm or more (subject to viability) and as such I recommend **MM40**.

Conclusion on Matter 8

220. Subject to the proposed main modifications identified, I find the proposed suite of policies for the management of development to be justified, effective, positively prepared and consistent with national policy, and therefore sound.

Matter 9: Monitoring

Issue 12 - Whether the Plan would be monitored effectively?

221. The submitted Plan contains a Monitoring Framework which indicates how the implementation of policies will be measured and when intervention would be necessary and what it would entail. The annual monitoring report, five year housing land statements and LIP processes will provide an appropriate basis to inform the monitoring and establish plan performance. Additionally, the monitoring framework refers to partnership arrangements including with adjoining authorities and more widely through SEMLEP and other activities. These wider arrangements will also provide signals for future plan review work.

222. Overall, the Plan would effectively ensure development progress, including infrastructure, is monitored so that timely interventions can be made where necessary.

Public Sector Equality Duty

223. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010 including during my consideration of such matters as the provision of traveller sites and the need for accessible and adaptable housing**.** In doing so, I have taken into account the Council's Equalities Impact Assessment Screening Report 2017 [MK/SUB/009].

Assessment of Legal Compliance

224. My examination of the legal compliance of the Plan is summarised below.

225. Plan:MK has been prepared in accordance with the Council's Local Development Scheme 2017-2020.

226. Consultation on the Plan:MK and the proposed MMs was carried out in compliance with the Council's Statement of Community Involvement.

227. Sustainability appraisal has been carried out. The approach taken in Milton Keynes is a particularly focused and narrative-based approach which has appropriately concentrated on those areas where there are genuine significant effects and reasonable alternatives. The outcome is a more transparent report that avoids the issue of sustainability appraisal becoming an unmanageable audit trail of options that are either not sufficiently distinct alternatives and/or options that have no significant effect in terms of the SA (including environmental) objectives. Following the examination hearings some additional work was undertaken in the SA addendum to reflect the proposed main modifications but also present the key sustainability appraisal findings in a more systematic (tabular) format and to expand the discussion on some aspects of the environmental reporting to align with the requirements of Strategic Environmental Assessment. With these amendments the SA is adequate.

228. The Habitats Regulations Assessment (HRA) Screening Report October 2017 [MK/SUB/007] sets out why an appropriate assessment is not necessary. There are no internationally protected sites within or proximate to the Borough. The report has considered the likely significant effects on the closest sites at the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Ramsar Sites and the principal risks to site integrity relating to recreational pressure and water quality and resources. Natural England has not objected to the HRA accompanying Plan:MK. I am therefore satisfied that an appropriate assessment is not required.

229. The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

230. Looking at Plan:MK as a whole, it sets out strategic objectives to mitigate the impact on climate change, reduce carbon dioxide emissions and manage increased travel demands, including promoting improvements to public transport and encouraging greater levels of walking and cycling. The spatial strategy and proposed strategic sites align with this by locating growth where there are genuine travel choices, including connectivity to the Redway cycle routes and public transport (Policies CT2, CT3 and CT5). More specifically the Plan supports low emission vehicles (Policy CT6), the management of flood risk including sustainable drainage (Policies FR1 and FR2), the provision and protection of green infrastructure (Policy NE4) and the avoidance of unacceptable environmental pollution (Policy NE6).

231. Furthermore, Chapter 17 of Plan:MK sets out a suite of policies which support sustainable construction and renewable energy. This includes, amongst other things, a requirement to submit an Energy and Climate

Change Statement on major development proposals (Policy SC1), the introduction of the optional technical standard to sustainably manage water consumption (Policy SC1) and support for community energy networks (Policy SC3) and renewable energy schemes (Policies SC3 and SC4).

232. I am therefore satisfied that Plan:MK provides a reasonable and effective approach for land use planning in the Borough to mitigate, and adapt to, climate change, as required by law.

233. In drawing this together, I conclude that Plan:MK complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

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

235. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix Plan:MK satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Spencer

Inspector.

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

The Planning Inspectorate

Report to Buckinghamshire Council

by Paul Clark MA(Oxon) MA(TRP) MRTPI MCMI

an Inspector appointed by the Secretary of State

Date: 19 August 2021

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

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

A

The Plan was submitted for examination on 28 February 2018

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

File Ref: PINS/ J0405/429/9

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Schedule of Main Modifications Appendix

Abbreviations used in this report

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

Non-Technical Summary

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

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

The Main Modifications can be summarised as follows:

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

Introduction

1. This report contains my assessment of the Vale of Aylesbury Local Plan 2013-2033 in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019 and July 2021. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.

3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Vale of Aylesbury Local Plan 2013-2033 (the VALP), submitted in February 2018, is the basis for my examination. It is the same document as was published for consultation in November 2017, accompanied by a Schedule of suggested minor changes, needed post publication (February 2018), which reflect the correction of errors and amendments to procedural text to reflect the progression of the plan's preparation.

4. The Plan was submitted for examination by Aylesbury Vale District Council (AVDC) in February 2018. On 1 April 2020, under the Buckinghamshire (Structural Changes) Order 2019, the Districts of Aylesbury Vale, Chiltern, South Bucks and Wycombe were abolished as local government areas and the district councils which related to those areas were wound up and dissolved. In their place a new non-metropolitan district, Buckinghamshire, was established as the sole principal authority for this new, non-metropolitan district. In short, since 1 April 2020, Aylesbury Vale District Council has ceased to exist and Buckinghamshire Council has taken its place.

5. Under the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, where functions are now to be exercised by the successor council, anything done by the predecessor council (AVDC) in the exercise of its functions shall have effect as if done by the successor council (Buckinghamshire Council). Therefore, the preparation of VALP, undertaken by AVDC prior to 1 April 2020 is to be treated as having been undertaken by Buckinghamshire Council.

6. Furthermore, the regulations make provision for a prepared but as yet unadopted local plan to be adopted, with or without modifications, by the successor authority (Buckinghamshire Council). In this report, unless stated otherwise, the phrase "the Council" means AVDC up until 1 April 2020 and

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

Main Modifications

7. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks (5 November 2019 to 17 December 2019). A number of representations were made which raised further issues of soundness, following which the Council prepared a schedule of further proposed modifications, also subject to sustainability appraisal and public consultation, extended to eight weeks over the Christmas period (15 December 2020 to 9 February 2021).

8. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any MMs necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2** etc, and are set out in full in the Appendix. For ease of identification, the numbering of the modifications approximates closely to the numbering used in the Council's published consultation documents but some have been merged, resulting in discontinuous numbering in places [MMs 15, 76, 78, 80, 119-147, 160-167, 172, 173, 182, 225-227, 229-231, 250-253, 258, 259, 263-267 are numbers not used]. Where the Council proposed a further modification which was not to a previously proposed modification, the numbering sequence is interrupted with lettered suffixes, A, B, C etc. In all cases, the text and paragraph numbers as proposed to be modified are those of the Plan submitted for examination in February 2018, not that of the Plan as Proposed to be Modified which was published by the Council in October 2019.

9. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary I have noted these amendments in the report.

Policies Map

10. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the relevant changes are illustrated on a series of maps provided in section 13 of the submitted plan.

11. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, in this particular instance, the proposed changes are provided as a

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

12. Moreover, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies maps is not justified and changes to the submission policies maps are needed to ensure that the relevant policies are effective.

13. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Vale of Aylesbury Local Plan 2013-2033 and the further changes published alongside the MMs.

Context of the Plan

14. The Vale of Aylesbury Local Plan (2013 – 2033) is proposed to replace the saved policies of the Aylesbury Vale District Local Plan 2004. The new plan will sit with The Buckinghamshire Minerals and Waste Local Plan 2016-2036 adopted on 25 July 2019 and a number of Neighbourhood Plans to constitute the full development plan for the part of Buckinghamshire Unitary Authority which was formerly the Aylesbury Vale District. The former District was large (900 sq km) and mainly rural in character but its area forms part of a swathe of local authorities in Oxfordshire, Buckinghamshire, Bedfordshire and Hertfordshire which are experiencing some of the fastest housing growth rates in the country.

15. Aylesbury is by far the largest town in the former District. It was, and is, the county town. Its population was over 40% of that of the whole district, more than five times that of Buckingham, the second largest settlement. Other main settlements are Winslow, Wendover and Haddenham. Aylesbury dominates the southern part of the former District. The fast-growing city of Milton Keynes borders and economically dominates the northern part of the former District. The substantial twin town settlement of Leighton Buzzard and Linslade, almost as large as Aylesbury itself, abuts the eastern edge of the former District.

16. The southern part of the district contains substantial tracts of high quality landscape, including part of the Chilterns Area of Outstanding Natural Beauty (AONB), and is also partly within the Metropolitan Green Belt around London. Districts to the south of Aylesbury Vale have significant environmental constraints due to the AONB and Green Belt designations, which can affect the scale and type of development they can accommodate.

Public Sector Equality Duty

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

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

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

Assessment of Duty to Co-operate

19. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

20. The four former Buckinghamshire Districts (Aylesbury Vale, Chiltern, South Bucks and Wycombe), the County Council and the two Local Enterprise Partnerships (Buckinghamshire Thames Valley Local Enterprise Partnership and South East Midlands Local Enterprise Partnership) formed the Bucks Planning Group at an early stage of plan preparation. This supervised the joint commissioning of joint studies from 2014 onwards.

21. These defined the relevant Housing and Functional Economic Market Areas, Objectively Assessed Need for housing and economic development and the housing requirements for all four districts collectively and individually. They identified the need for VALP to take on board housing needs which could not be met elsewhere in Buckinghamshire. They also updated a previous study of Gypsy and Traveller and Travelling Showpeople Accommodation Needs and an assessment of the Green Belt. It is evident from the submitted plan itself, the representations submitted and the supporting documents, including the Duty to Cooperate Statement of Compliance, that these arrangements secured cooperation on strategic housing, economic, Gypsy and Traveller and Green Belt matters between the authorities involved.

22. Other authorities (Royal Borough of Windsor and Maidenhead, Slough Borough, South Oxfordshire, Cherwell, Dacorum) were engaged on these matters from time to time, with Memoranda of Understanding being signed at various times. In addition, a far wider range of authorities were consulted. The Council has participated in the Steering Groups of the Luton and Central Bedfordshire Strategic Housing Market Assessment and Housing Market Area Boundaries Study.

23. For Strategic Flood Risk Assessment and Water Cycle Studies a stakeholder Group of Buckinghamshire County Council, the Environment Agency and two Water Utility Companies were engaged with studies carried out in 2016 and 2017 in time to be taken into account in the Submission Draft plan published in November 2017. Regular quarterly meetings of the Buckinghamshire Flood Technical Management Group continue.

24. County-wide consideration of transport issues seems to have got off to a slower start, with phase 1 of the Countywide Local Plan modelling report being

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

25. Although many authorities outside Buckinghamshire are listed in the Council's Duty to Cooperate Statement of Compliance as Strategic Partners in this work, representations from Oxfordshire and Hertfordshire County Councils record disappointment that up to the end of January/beginning of February 2018 very little work on cross boundary transport impact had been undertaken. Oxfordshire asserted in its representation that it had not been involved in modelling and related transport discussions and was concerned that insufficient attention had been paid to its comment submitted on the Aylesbury and Buckingham Transport Studies.

26. But a Memorandum of Understanding between the Council, Wycombe and South Oxfordshire District Councils and Buckinghamshire and Oxfordshire County Councils postdates these representations. It is dated 26 February 2018, immediately prior to the submission of the plan on 28 February 2018. It records agreement to cooperate on matters concerning strategic transport networks, to consult on policies and proposals that affect the strategic network or which have cross boundary impacts and to work together on the identification and delivery of appropriate interventions. It specifically identified four issues for future work and so addresses the representations made earlier. It is therefore evidence that the five signatory authorities have engaged constructively on strategic cross-boundary matters as part of the duty to cooperate.

27. Notwithstanding the representation made by Hertfordshire County Council, a memorandum of Understanding with Dacorum Borough Council dated 23 February 2018 records the strategic modelling work being undertaken by both Hertfordshire and Buckinghamshire County Councils and records agreement that there are currently no duty to cooperate concerns on matters concerning strategic transport networks in their respective emerging Local plans.

28. The Council's Duty to Cooperate Statement of Compliance confirms that its work on Open Space, Sport and Recreation matters did not engage strategic partners. On wider strategic issues it claims active engagement with the Bucks and Milton Keynes Natural Environment Partnership and this can be seen in section 9 of the submitted plan. Representations from South Oxfordshire District Council and from Thame Town Council suggest that there is more to be done in relation to cross-border leisure and social infrastructure issues. Those representations confirm, in themselves, that cooperation has taken place, albeit that the outcome is a recognition of more work needed.

29. At a very late stage in the plan's preparation (February 2018), Memoranda of Understanding have been signed with Buckinghamshire County Council, Cherwell District Council, Chiltern District Council, South Bucks District

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

30. Representations to the Modifications from Milton Keynes Council demonstrate that the duty to cooperate is not the same as a duty to agree. Nevertheless, further modifications to the original modification have resulted from the interaction with Milton Keynes Council leading to the recommended modification [**MM75**]. This demonstrates that not only was the Duty to Cooperate discharged in the preparation of the plan but that dialogue has continued through the preparation of modifications and continues still, even though the formal Duty to Cooperate applied only to the preparation of the originally submitted plan.

31. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

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

Issue 1 – Whether the Spatial Distribution Strategy is sound

33. VALP's spatial distribution strategy is set out in policies S2 and S3 and associated Tables 1 and 2. The essence of its justification is set out in paragraph 3.14 of the plan and elaborated upon in paragraphs 3.19 and 3.20. It is proposed to focus the majority of growth in and around six strategic settlements, one of which (Milton Keynes) is outside but immediately adjacent to the District. These are said to be chosen to minimise the need to travel, optimising sustainable modes of travel, helping to deliver services and facilities needed and enabling an integrated and balanced approach to the provision of homes, jobs and leisure.

34. In principle, this is a strategy which focuses significant development in locations which are, or can be made, sustainable and is likely to result in the creation of an environment with accessible local services that reflect a community's needs and supports its health, social and cultural well-being. The

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

35. As opposed to its principles, the sense of the application of the spatial strategy in practice can be seen by reference to the existing sizes of settlements, their new allocations for housing development and their expected development (including commitments) over the plan period[1]:

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

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

[1] Percentages are rounded so may not sum
[2] This figure represents the population of Aylesbury parish and so excludes contiguous built-up areas of Buckingham Park to the north-west, Fairford Leys to the west and built-up areas to the south of the town. An alternative figure, for an area which still excludes Buckingham Park but also includes the separated village of Bierton to the north-east of Aylesbury would be 71,977, 50% of the former district.
[3] At Halton, outside but near to Wendover.
[4] Ditto

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

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

Villages

38. The dominance of Aylesbury and the small role for villages is actually a moderation of policy compared with the previous local plan which concentrated 65% of allocations in and around Aylesbury. Nevertheless the strategy still represents a substantial proportionate shift of settlement away from rural locations towards urban centres.

39. The concern is that paucity of allocations and restrictive policies on growth in villages may be inconsistent with the strategic aim stated in paragraph 4.183 of the plan that communities continue to thrive and do not stagnate or go into decline. Part of policy D6 asserts that "local and village centres will be encouraged to grow and loss of essential facilities and businesses such as local shops, pubs and post offices will not be supported." Policy I3 also asserts that the Council will resist proposals for the change of use of community buildings (defined as including shops, post offices and public houses) and facilities for which there is a demonstrable need.

40. Although these policies are concordant with the NPPF, they face the tide of economic reality in rural areas, recognised in paragraph 2.8 of the Council's Settlement Hierarchy Assessment, September 2017 and so, need more than assertion if they are to be effective and deliverable. The Council's response to my Q1 indicates that their viability and deliverability in the context of paragraphs 4.122, 4.145 and 4.14 of the Plan, which seek to place restrictions on growth in rural villages, has not been tested.

41. Policy D3 of the Plan advises that new housing development at smaller villages will be supported where it contributes to the sustainability of that village, thus allowing for the possibility that additional population could provide additional demand to sustain ailing services or facilities. There is no equivalent provision in policy D2 applying to medium and larger villages. In the case of smaller villages, the limitation of each site to five dwellings or fewer (criterion (c) of the policy) would limit the benefit of any but cumulative effects. As noted elsewhere, this policy would preclude the application of policy H6 to secure the provision of affordable housing in small villages.

42. Evidence which the Council presented in response to my Q1 shows how the provision of net additional dwellings at larger and medium villages is set to rise significantly over the next five years or so. Commitments fall away after that period and only three of the twelve larger villages have any allocations thereafter listed in VALP table 2, though the Council's response to my Q1 asserts that nine of the twelve have either VALP or NP allocations.

43. I am not convinced that the large commitment to growth in Aston Clinton (32% of the growth in larger villages) is necessarily a sound reason to preclude further growth allocations in the longer term but it is at least an explanation. The Council also explained that it did not make allocations to villages where development was also happening elsewhere in the same parish (this applies to Stoke Mandeville as paragraph 4.142 of the plan explains).

44. Only six of the nineteen medium villages listed in VALP table 2 have allocations. One of those, taking 16% of the total development expected to take place in medium villages, is Maids Moreton. In many ways this village may be regarded as a part of Buckingham (local residents would disagree) with which the village is contiguous. This emphasises the minimal contribution to the development strategy which free-standing medium sized villages are expected to make. High percentages of commitments at Cheddington and at Stoke Hammond may offer an explanation for an absence of allocations in those particular cases. The omission of growth allocations in many of the other larger or medium villages does not even have that explanation.

45. Although policies D2 and D3 do not preclude growth in settlements on sites not allocated, supporting text in paragraphs 4.122, 4.145 and 4.154 appears to do so. Modifications are necessary to eliminate the inconsistencies, to allow continued growth even after the next five years or so and to comply with national policy set out in NPPF paragraph 54 [**MMs 79, 91 and 97**]. The Council also accepted that a modification to policy D2 to make it clear that it is in two parts is necessary for clarity (and hence, effectiveness). I agree with that and the need to redraft criterion (c) to remove internal inconsistency and to be consistent with the footnote of policy H2.

46. Although the HELAA process by which allocations were identified took account of the provision of facilities and services within each settlement, it did not take account of the potential for sites to contribute to the support or provision of such services or facilities. In similar fashion, the classification of villages into their position in the settlement hierarchy was based on a snapshot in time, recording facilities and services as they existed at a particular moment. It does not take into account the potential for settlements to acquire improved facilities or services as a result of development taking place or proposed to take place.

47. As a consequence there are many representations to the effect that the capacity of settlements has been underestimated or that the position of certain settlements within the hierarchy has been misplaced. For the most part, these contentions, insofar as they do not simply pursue the claims of "omission" sites, are marginal to the overall soundness of the spatial distribution strategy.[5] Nevertheless they do indicate that it has imperfections.

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

48. I understand and concur with the Council's point that a development which could make much difference to the services and facilities a village has to offer might well have to be so large that it would overwhelm the capacity of the village to accommodate the development. I also concur with the point made in response to my Q86 that a dispersed settlement strategy in which all of the Council's housing needs would be met in a dispersed way would be inappropriate as it would require dispersed infrastructure provision and a dispersal of and an increase in travel movements to access essential services which would not be an effective or sustainable approach.

49. The Council's capacity-led approach to identifying allocations received widespread support. I agree that it has more justification than arbitrary allocations based on existing settlement size. Nevertheless, in my Interim Findings, I did consider that further work needed to be done at the margins of this approach to ensure that the vitality of rural communities could be maintained or enhanced in the way envisaged by NPPF paragraphs 54 and 55.

50. I suggested firstly, identifying those allocations which could positively support the sustainability credentials of a particular village either where the prospects of continued retention of its services or facilities are marginal or where the capacity of its existing services and facilities to support further development are marginal. My second suggestion was to take account of that potential in the classification of villages within the settlement hierarchy (in other words, to take account of a settlement's need for further development in order to support services and facilities).

51. The Council points out that its evidence on commitments in villages does not include allocations in emerging or made Neighbourhood Plans but those of made Neighbourhood Plans are included in table 1 of the plan on which my table above is based. The Council's proposed modification to policy D4 [**MM107**] is consistent with its approach and is necessary for clarity but does not specifically address an issue of substance. My analysis, discussed elsewhere, of the relationship between VALP and Neighbourhood Plans shows that, although the relationship is sound, VALP does not give much incentive for further Neighbourhood Plans to come forward. In my view, to give Neighbourhood Plans for villages the explicit task of identifying development opportunities which would sustain or improve their position in the development hierarchy would go some way towards alleviating the concerns I have about the role of villages in VALP's spatial distribution strategy.

52. In the event, Modifications to Table 2 and policy D2 proposed in November 2019 in response to other of my recommendations reflect the passage of time in which decisions made on planning applications increase the total development in large and medium villages by 16-17%. The further modifications which the Council put forward in November 2020 indicate a still greater effect of that phenomenon.

53. This outturn, reflected in the revised modifications to table 2 and policy D2 which I now endorse for other reasons explained below [**MMs 10, 11, 12, 14 and 79**] vindicates my acceptance of the Council's view that it would not need to pursue further allocations in villages in order to reach a more balanced Spatial Strategy. Although the Council reports that it is undertaking a review of development proposals on unallocated sites relating to villages, the level of

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

North and south

54. An arbitrary line dividing the District into two areas more or less equal in geographic extent shows that the northern half of the district is expected to receive 24-28% of the housing development expected (commitments and allocations) during the plan period and the south 72-76%[6]. But the existing distribution of the population in the district is not evenly divided. The Milton Keynes Housing Market area[7] extends over about half of the north of the district and encompasses about 16% of the existing population. The other half of the north of the district (within the Oxford housing market area) is even less densely populated. It follows that the approximately 1:3 ratio in the distribution of future development reflects the existing population distribution and so is not necessarily unsound.

55. Moreover, just under 30% of the housing development envisaged in the plan period is intended to accommodate demand displaced from districts to the south of Aylesbury Vale so it may be expected that a higher proportion of development should be allocated as near as possible to the source of demand. Therefore I conclude that the 24-28% of development expected to occur in the northern half of the District is not disproportionately low or unsound, although it is fair to observe that analysis of the housing trajectory shows that delivery in the north of the district peaks in 2023/4, then tails off, with no allocations expected to deliver towards the end of the plan period[8].

Milton Keynes

56. What is surprising is that within the northern half of the district the roles of Buckingham, Winslow and Milton Keynes are relatively equal in the anticipated distribution of development. Milton Keynes, the dominant settlement, is not expected to dominate the development strategy. This contrasts with the south of the district where the strategy concentrates most development around the dominant settlement, Aylesbury. Yet all three of the northern settlements lie within the Milton Keynes Travel to Work Area.

57. Whilst accepting that the Buckingham and Winslow Neighbourhood Plans seek to make those towns much more self-contained communities and recognising the point made in an earlier paragraph that all settlements must be allowed to grow to retain their vitality and viability, the contrast between the north of the

[6] The range of figures represents the differences between evidence given in representations and the evidence given in hearing statements.
[7] As defined in 2015; subsequent redefinitions largely removed the Oxford HMA from covering any part of the Aylesbury Vale District
[8] See figure 4.1 of Technical Appendix 6 of representation 2016 by Savills on behalf of Crest Strategic Projects (respondent number 27869)

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

58. This would be contrary to national policy expressed in paragraph 34 of the NPPF which advises that plans should ensure that developments which generate significant movement are located where the need to travel will be minimised. It is therefore unsound. For reasons which are stated elsewhere in this report, I reach the conclusion that insufficient land has been identified for housing and that additional allocations need to be made. This inevitably means revisiting the decision which led to the spatial development strategy known as option 3 in the Sustainability Appraisal being selected for VALP and so gives rise to an opportunity to redress the balance of the chosen spatial development strategy in the north of the district.

59. Modifications to the plan are required to redress the balance, by increasing allocations in close proximity to Milton Keynes [**MMs 7, 10, 11, 12, 70, 71, 75 and 77].** The Council's response to this finding generated considerable controversy which led to me holding a further hearing session on the subject. I discuss this in another section of my report. These modifications have been adjusted following consultation on further modifications proposed by the Council so as to respond to representations made, taking on board all such of Milton Keynes Council's suggestions as can presently be justified with evidence.

Aylesbury

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

2010 – a spatial odyssey

61. That Inspector's preliminary findings[9] were that the growth arc to the east of Aylesbury then proposed did not represent the most appropriate strategy when compared with alternatives. In the currently submitted plan the Council appears to have taken this observation on board by omitting an allocation to the north-east of Aylesbury and adding southern and eastern allocations.

62. In detailed comments the Inspector in 2010 observed that the Aylesbury South East site (then referred to as site D) was the best performing element of all proposals and should be included in any strategy. This is understood to equate to allocation AGT4 in the submitted plan. The Inspector then described

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

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

63. In later passages, the 2010 Inspector recorded that he considered the North East site (then referred to as C) to be the most sensitive, where the Aylesbury Growth Arc proposals would have the most harmful effect. This site is not included in the current plan's allocations. He commented that the East site (understood to be allocation AGT6 in the current plan) has some attractive elements but that the overall quality of the landscape is not significantly different from the SE, S and SW sites and does not preclude its development.

64. In a later passage, the Inspector in 2010 commented that the proposed Eastern Growth Arc would have a very serious impact on Bierton and Broughton Crossing, with a very real danger that the new development would swamp the existing settlements, despite any green buffers. Paragraphs 6.5.11 and 6.5.12 and the Technical Annex of the Sustainability Assessment Report describe the consideration which was given to these and other matters before selecting the option of including allocation AGT3 within the plan's spatial strategy in preference to the north-eastern major development area which is omitted from the currently submitted plan. The 2010 Inspector identified similar issues for the southern arc (now AGT1, 2 and 4) but observed that by their nature the larger settlements affected, e.g Stoke Mandeville and Weston Turville, would remain as significant entities and have greater critical mass to withstand overpowering encroachment.

65. The Inspector in 2010 requested the Council to investigate combining the SE site (AGT4) with a site at Fleet Marston and one unidentified other, though he did caution that he would need to see the outcome of that further work before reaching a firm conclusion about the most appropriate way to meet the requirement for substantial housing growth at Aylesbury. He acknowledged both advantages and disadvantages associated with the Fleet Marston option in terms of access and noted that it would be likely to be seen as an isolated new settlement in open countryside.

66. In the event two sites at Fleet Marston were considered in the HELAA (reference FLM001 and FLM002). One was assessed as unsuitable on grounds of landscape, heritage and transport. The other was assessed as unsuitable because of HS2 safeguarding, flood risk, landscape and biodiversity. VALP does not include these sites. Instead it includes allocation AGT3, comprised of a number of sites variously assessed in the HELAA as suitable, partially suitable or not suitable but where the elements of unsuitability (largely flood risk) are said to have been addressed.

67. The above narrative demonstrates that the strategy of the submitted VALP in terms of the distribution of allocations around Aylesbury is not inconsistent with the 2010 Core Strategy inspector's findings and so is not unsound on that ground. The various allocation proposals include measures to avoid coalescence with existing settlements and so are made consistent with the

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

Market saturation

68. Many representations express concern that the strategy of concentration of development in Aylesbury presents a high risk of market saturation, because it relied on 60% of the purchasers of new housing in the District to buy in Aylesbury itself. But none offered any advice on how to determine whether this would, in fact, be the case. Those who expressed the concern accepted that the evidence[10] showed no sense of finite market capacity in Aylesbury.

69. It was also suggested that the best guide is past performance. As the Council points out, past performance has begun to exceed expectations at the Berryfields and Kingsbrook developments in Aylesbury. I conclude that the fear of market saturation is not a reason to find VALP unsound.

Conclusion on spatial strategy

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

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

71. Paragraphs 82 to 84 of the NPPF set out the national position on defining new boundaries. Relevant guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use.

72. The Framework requires, and Case law has consistently confirmed, that Green Belt alterations require 'exceptional circumstances' to be demonstrated by the local planning authority. For example the judgement in Gallagher Homes Ltd v Solihull Borough Council ([2014] EWHC 1283 (Admin), Hickinbottom J) cited the considerable amount of case law on the meaning 'exceptional circumstances' and concluded that "it is not arguable that the mere process of preparing a new Local Plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary". Case law also confirms that decision-makers should take into account the consequences for sustainable development of any review of Green Belt boundaries, including patterns of development and implications for additional travel.

73. Although the mere process of preparing a new Local Plan is not, of itself, an exceptional circumstance which justifies an alteration to a Green Belt boundary, paragraph 83 of NPPF (2012) advises that at the time of preparation or review of the Local Plan, authorities should consider the Green

[10] Wessex Economics Housing Delivery Study for Buckinghamshire, August 2017

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

74. The Council's Green Belt Topic Paper offers three reasons for the proposal to designate additional Green Belt land at the twin towns of Leighton Buzzard and Linslade (Leighton-Linslade). One is to help balance the loss of Green Belt in other areas, including elsewhere around Leighton Buzzard. Another is to provide a more recognisable boundary than the present County and District boundary. A third is to complete Green Belt protection on all sides of Leighton-Linslade.

75. The first two of these reasons are not good or sound reasons for designation of a piece of Green Belt because there is no requirement for a fixed quantity of Green Belt land to be designated[11] and because the current administrative boundary, following a ridgeline, is already sufficiently recognisable. The third reason was explained more fully during a hearing session by the fact that different administrative authorities had different timescales for delineating the Metropolitan Green Belt.

76. The Central Bedfordshire and Luton Green Belt Study of November 2016 explains that the adoption of the Bedfordshire County Structure Plan in 1980 gave the Green Belt statutory force. Its purpose was to contain the outward growth of Luton, Dunstable and Houghton Regis; Leighton-Linslade; and Ampthill and Flitwick and prevent the coalescence of settlements within that area. These latter are all settlements to the east of Leighton-Linslade and so the risk of coalescence does not apply to its west side but the purpose of containing the outward growth of Leighton-Linslade remains on all sides.

77. The Central Bedfordshire and Luton Green Belt Study adopted an assessment framework based on the first four of the five bullet points of NPPF paragraph 80 and adopted all four in relation to Leighton-Linslade. It makes some recommendations for adjustments to remove Green Belt designation from small parts within Central Bedfordshire of the two cross-border parcels which are considered in the VALP Green Belt proposals but finds that for the most part they continue to make a strong contribution to the purposes of the Green Belt. These recommendations are taken forward in the submitted local plan for Central Bedfordshire.

78. Although recent planning history demonstrates that normal planning and development management policies are adequate to protect the landscape significance of the two land parcels in question, the evidence described in the two preceding paragraphs, prepared by each of the local authorities on either side of the administrative border, convinces me that there is a necessity for

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

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

79. Paragraph 5.58 of the Report of Findings of Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas (March 2015) records that Leighton Buzzard's retail catchment extends into Aylesbury Vale. The town is recognised on VALP's District Key Diagram as a Neighbouring Settlement. It is therefore appropriate to consider what the consequences of the proposal to designate additional Green Belt would be for sustainable development as it would limit the outward growth of Leighton – Linslade into Aylesbury Vale.

80. In the past, the location west of Leighton-Linslade has been recognised in general terms as an appropriate location for growth.[12] But it has since been considered and rejected as a location for growth by Central Bedfordshire District Council preparing its Development Strategy in 2012 (subsequently withdrawn). There is no request from Central Bedfordshire for VALP to accommodate any of the housing or other growth requirements of Leighton-Linslade which are apparently proposed to be met within Central Bedfordshire itself, in part by the implementation of the Central Bedfordshire and Luton Green Belt Study already noted.

81. On the information currently before me there is no consideration which would lead me to conclude other than that the proposed extension of Green Belt into Aylesbury Vale is soundly based. As noted above, in accordance with government policy, the preparation of the Local Plan is when local authorities should consider their Green Belt boundaries. The termination of the Green Belt at the County boundary was a happenstance resulting from the different timescales of plan production in different administrative areas; the extent of designation in Aylesbury Vale represents unfinished business. That is the exceptional circumstance which justifies a review of the boundary.

82. Construction of the A4146 Leighton by-pass is a further circumstance justifying the occasion for review. Although, as explained earlier, the new boundary suggested by the road does not of itself justify the designation of additional green belt land, it provides a clearly defined, defensible boundary for the addition of land which is justified for other reasons. Following my examination of its housing requirements, the Council has considered the need to identify further development sites within Aylesbury Vale and has confirmed that it can meet its revised housing requirements without the need for development at Leighton-Linslade. Consequently, I find that the designation of additional Green Belt land to the west of Leighton-Linslade would have long-term permanency and so is justified and sound.

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

Issue 3 – Whether housing needs would be effectively met.

Housing Market Area

83. Paragraph 47 of the NPPF advises that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. It does not advise that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in its local authority area. Yet, apart from combining the Aylesbury Vale local authority area with those of Wycombe, Chiltern and South Buckinghamshire, that is what the evidence base for VALP effectively does by using local authority boundaries as a surrogate "best fit" Housing Market Area for the collection of data and for calculating Objectively Assessed Needs.

84. Housing Market Areas do not have finite boundaries; they are best conceived as zones of influence which both overlap and change over time and according to the geographic scale of market being considered so that, for example, it is sometimes possible to discern several local housing market areas within a larger regional housing market area.

85. National Planning Practice Guidance advises that need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period[13]. Needs are rarely constrained precisely by local authority administrative boundaries.[14] Needs should be assessed in relation to the relevant functional area, ie housing market area[15]. For housing, where there are issues of affordability or low demand, house price or rental level analyses will be particularly important in identifying the assessment area[16]. A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work[17].

86. The inference is that different housing market areas have different characteristics. Guidance advises that the definition of housing market area boundaries enables the identification of areas which have clearly different price levels compared to surrounding areas[18]. In response to a question, the Council's consultant advised that the risk of wrongly defining the Housing Market Area affected the adjustments and uplifts included in the Objectively Assessed Need to reflect the alignment of jobs and workers and market signals.

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[13] Guidance paragraph 003 Reference ID: 2a-003-20140306
[14] Guidance paragraph 007 Reference ID: 2a-007-20150320
[15] Guidance paragraph 008 Reference ID: 2a-008-20140306
[16] Guidance paragraph 009 Reference ID: 2a-009-20140306
[17] Guidance paragraph 010 Reference ID: 2a-010-20140306
[18] Guidance paragraph 011 Reference ID: 2a-011-20140306

87. From the evidence available, it is clear that in recent times, Aylesbury Vale District has been pulled between three or four sub-regional housing market areas. A study in 2015, largely based on commuting flows and travel to work areas, confirmed a 2004 study that (in terms of geography, not population) the district was fairly evenly divided between HMAs based on Oxford, Milton Keynes and Central Buckinghamshire with a significant influence from a Luton centred HMA. A later study of June 2016, pulling more recently released fine-grain migration data from the 2011 census discounts the influence of Oxford and concludes that, in terms of population, about 80% of the Aylesbury Vale District fell within the Central Buckinghamshire Housing Market Area. Office of National Statistics studies on travel to work areas shows a parallel shift in the relative influence of Milton Keynes, Oxford and High Wycombe on Aylesbury.

88. Whilst I have no doubt that the identification of the Central Buckinghamshire HMA as the "best fit" for the collection and analysis of data is the most pragmatic administrative arrangement, it is necessary not to lose sight of three facts;

- Actual housing markets continue to function irrespective of whatever surrogate HMA is chosen for the basis of data collection and analysis.[19]

- Approximately one-fifth (in terms of population) and about one-third (in terms of area) of Aylesbury Vale District falls outside the "best fit" HMA and so is likely to experience the market forces of a different HMA to that analysed in the evidence base.

- The identification of self-contained travel to work areas using 2011 census data showed that the majority of Buckinghamshire (and Aylesbury Vale) outside the influence of Milton Keynes forms part of a London travel to work area and that the influence of London had to be excluded in order to define the local housing market areas outside its influence.[20] Nevertheless, in practice that influence will remain.

89. For these three reasons I would have expected specific checks and adjustments to be made to the calculations based on the "best fit" HMA analysis to reflect the influence of the London Housing Market area on the part of Aylesbury Vale so affected and also to reflect the different characteristics of the Milton Keynes HMA in the part of Aylesbury Vale which falls outside the Central Bucks (and London) Housing Market areas and within the Milton Keynes HMA. Other than a general exhortation of the need for Aylesbury Vale District Council to maintain dialogue with Milton Keynes, Oxford and areas to the north of London as well as the Mayor of London through the Greater London Authority, these checks and adjustments do not appear to have been made.

[19] See paragraph 24 of the Executive Summary of the 2015 report *Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas* and paragraph 9 of the Council's Response to my initial questions on the HEDNA.
[20] Ibid, paragraphs 3.8 and 3.10 and figure 18

90. In response to my specific question during the hearing sessions, the Council's consultant, who is also the consultant to Milton Keynes Borough Council on similar matters, advised me that there may be a case to make different adjustments for different market areas, giving as an example the different uplift for market factors recommended between VALP and Wycombe Local Plan. He commented that there is alignment between MK and Aylesbury Vale in terms of labour force and affordability but accepted that the comparison had not been specifically tabulated within the evidence base. In his view the recognition of Milton Keynes as a separate Housing Market Area is a matter for the spatial distribution strategy rather than OAN adjustments.

91. In this report, I have accepted that advice and conclude that the identification of the Central Buckinghamshire HMA as the "best fit" for the collection and analysis of data provides a sound basis for the evidence to show that housing needs would be effectively met. I recommend modifications to the spatial distribution strategy so as to recognise the effects of Milton Keynes as a separate Housing Market Area.

Demographic projections

92. National Planning Practice Guidance recommends the use of a standard methodology to assess housing need.[21] It advises that household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.[22] These suggest that household numbers across the defined Central Buckinghamshire Housing Market Area will increase by 42,772 from 2013 to 2033 (the plan period). These would place Aylesbury Vale within the top 10% of all local authorities in England in terms of population growth with a figure more than double the average. That does not necessarily make the projections incorrect but it has caused the Council to scrutinise them closely.

93. Guidance advises that the household-based estimates may need adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends.[23] Plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates.[24]

94. The Council argues that errors in the 2001 census have led to distortions in the components of change data used in the population projections which underlie the household projections. In contrast to the adjustments which the Council made to the household projections in its withdrawn Vale of Aylesbury Plan which attracted criticism from the examining Inspector at the time for attributing 100% of the unattributable component of change to migration with insufficient evidence, the evidence base now finds that approximately 3,400 of

[21] Guidance paragraph 005 Reference ID: 2a-005-20140306
[22] Guidance paragraph 015 Reference ID: 2a-015-20140306
[23] Guidance paragraph 015 Reference ID: 2a-015-20140306
[24] Guidance paragraph 017 Reference ID: 2a-017-201403036

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

95. The overall effect of the adjustments made by the Council to the population projections is to smooth the annual rate of growth in contrast to official figures which show an accelerated rate of growth 1991-2001 followed by decelerated growth 2001-2011. This fluctuation was not paralleled by housing completions. The Council, advised by its consultants, found this implausible. I concur. A comparison of the rate of increase in population indicated by the Mid-Year Estimates from the Office of National Statistics with the increases in population indicated by changes in the NHS patient register, by changes in the school census and by changes in the recipients of the state pension suggests that errors in the calculation continue to lead to an exaggeration in the mid-year estimates and so the Council makes an adjustment to these as the basis of its projections.

96. Notwithstanding the advice contained in national Guidance that the official household projections are statistically robust and the concerns expressed by representations that the official statistics have a quality assurance which the Council's figures do not offer, I am satisfied that the reasons advanced by the Council for departing from them in arriving at the starting point for its projections are adequately explained and robustly defended against critical analysis. They fall within the circumstances described by Guidance in which adjustments can legitimately be made to household projection-based estimates of housing needs. Nevertheless, although I am convinced by the Council's explanations of its adjustments to the population estimates at the start of the projections I am not fully convinced by the Council's figures in every respect.

97. In contrast to official projections which are based on recent (five-year) migration trends, the Council's projections are a range based on two ten-year trends, one more robustly founded on census data 2001-2011, the other based on more recent data 2005-2015. The Council adopts the higher of the two as the basis of its housing need for the plan period.

98. The Council bases its calculations on a ten-year migration trend because that is considered to iron out short term fluctuations to produce projections which are more stable. That is sound practice, with which I do not quarrel. But, the particular ten-year period used, whether 2001-2011 or 2005-2015, includes the years following the financial crisis of 2008 which are commonly recognised to be, not a short-term fluctuation, but a major interruption to long-term trends which will have depressed the average migration rate for whatever period includes the fall-out of that event.[26] This is not a point taken into

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

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

account in the various appeal decisions and reports referred to during the examination and which accepted the Council's forecasts[27].

99. I am therefore not convinced that sufficient migration has been accommodated within the Council's forecasts for the Central Buckinghamshire Housing Market Area.

100. To some extent, migration is a self-fulfilling prophecy, in that the supply of housing can induce migration[28] within a given travel to work area. Given the identified relationship between the Central Buckinghamshire Housing Market Area as defined, the wider London Housing Market Area with which it overlaps and the Milton Keynes Housing Market Area which prevails in the northern part of Aylesbury Vale district, this consideration is likely to be relevant to Aylesbury Vale.

101. Because there is little objective evidence submitted to the examination on which to base a precise alternative figure for migration, I have not required the Council to re-run its population and household projections for the whole of the Housing Market Area on different migration presumptions. Instead I prefer to treat such adjustments for additional migration as a "policy on" consideration and to "wrap up" the effects of this consideration when taking into account the effects of other uplifts in the calculation of housing requirements for Aylesbury Vale, so that, in effect, additional migration figures become more of an output from the process than an input to it.

102. The VALP evidence base separates out the institutional population in accordance with standard practice before applying a conventional factor to convert population to household rates and applying factors for concealed families and homeless households, second homes and vacant dwellings to arrive at a baseline housing need figure of 40,457 for the Central Buckinghamshire HMA based on demographic projections (17,719 for Aylesbury Vale alone). With the caveat expressed above, I accept the robustness of these adjustments.

Uplifts

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

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

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

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

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

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

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

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

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

107. Recent evidence shows the differences between Aylesbury Vale and the rest of the Housing Market Area decreasing which suggests that the uplift for VALP should more likely be 20% than 15%.This is a finding which differs from the conclusions reached in the various appeal decisions and reports which were submitted in evidence to the examination[29] but is based on more recent information. A check against ONS workplace-based affordability ratios for the lower quartile of house prices shows that over the last twenty years, Aylesbury Vale has sometimes been more affordable than Wycombe and sometimes the reverse. This confirms my view that, if using the "Eastleigh comparison", Aylesbury Vale should have an affordability uplift comparable to that of Wycombe.

108. Subsequent to the preparation of the HEDNA, a report from LPEG to the Communities Secretary and to the Minister of Housing and Planning March 2016 offers recommended systematic adjustments for market signals to replace the system of professional judgement used at Eastleigh and other local plan examinations thitherto. Application of this methodology would set a 25% uplift for market signals in Aylesbury Vale. I do not insist upon the application of this figure but take it as confirmation of my view that the "Eastleigh comparison" method produces an affordability uplift for Aylesbury Vale which is too low.

109. For all the above reasons I conclude that there needs to be a higher uplift to the baseline housing need so as to arrive at the full objectively assessed need for Aylesbury Vale. What that uplift should be is a matter of judgment. Taking account of my observations on migration rates, response to market signals and allowance for the early effects of the Cambridge – Milton Keynes – Oxford growth arc, my interim findings were that this should be at least 20% and probably 25%. It would have followed that the OAN for Aylesbury Vale (before considerations of unmet need from other local authorities is taken into account) would be (rounded) at least 21,100, probably 22,000.

110. Following my initial findings, the Council commissioned further work from its consultants ORS. That further work (Examination document ED180A) has convinced me that, as a matter of judgement, an OAN for Aylesbury Vale should be 20,600. The figure is reached by the following calculation;

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

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

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

111. The Council's consultants point out that the rate of growth identified for Aylesbury based on the OAN of the submitted plan would be 1.25% pa, higher than many other plans in the wider south east and around 20% higher than the 1.05% needed nationally to deliver 250,000 dwellings each year. They suggest that higher growth rates would be unbelievable. But the growth rate proposed for Aylesbury includes a considerable amount of growth displaced from other authorities within the HMA; that for the HMA overall is below 1% and would be less than the 1.05% needed to meet the national growth target of 250,000. Evidence provided to the examination demonstrates that a growth rate of 1.8% pa in a neighbouring authority is not unreasonable.

112. There is nothing inherently implausible in VALP exhibiting growth rates amongst the nation's highest. To produce an average, some authorities must be above the average in compensation for those who will be below it. Even if the ONS figures were accepted without adjustment, the growth rate for the HMA would be the lowest of all counties around London.

Unmet needs

113. The full objectively assessed need is identified for each of the components of the Central Buckinghamshire Housing Market Area. But it is anticipated that three of the components; Wycombe, Chiltern and South Buckinghamshire will not be able to accommodate their full objectively assessed needs. The extent of unmet need has been identified through joint working in accordance with the duty to cooperate, described earlier. The extent of Wycombe's unmet need to be supplied within Aylesbury Vale has been found sound at examination[30]. The extent of the other areas' unmet needs has not been tested at local plan examinations[31]. In all cases, agreement has been reached on the levels of demand which are likely to be displaced towards Aylesbury Vale through Memoranda of Understanding.

114. The Inspector's report for the Luton Local Plan corrected the objectively assessed need for the wider Luton Housing Market Area from "best fit" administrative boundaries to the full Functional Housing Market Area so as to include the small areas which fell outside the "best fit" but within North Hertfordshire and Aylesbury Vale[32]. He identified that 400 of the objectively assessed need arising from this wider area originated within Aylesbury Vale. He also found that the objectively assessed need for Luton could not be met within its boundaries and that the direction of unmet need would be identified through a Joint Growth Options Study.

115. In fact, by calculating Aylesbury Vale's objectively assessed need on the basis of a "best fit" housing market area following administrative boundaries, the Central Buckinghamshire HEDNA has incorporated the demand arising from

[30] Wycombe District Council Local Plan Inspector's report July 2019 paragraph 34.
[31] They will not now be tested because the Chiltern South Bucks Plan has been withdrawn. Nevertheless the identification of the need through joint working in accordance with the Duty to Cooperate remains.
[32] Luton Local Plan Inspector's report Main Modification MM09

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

116. I note the view of Slough BC that that authority's own unmet needs should be considered together with the unmet needs of that part of South Buckingham shire which falls within the Slough and Reading Housing Market Area in the Joint Growth Study which has been commissioned. I concur with the view that to the extent that South Buckinghamshire falls outside the Central Buckinghamshire HMA, its unmet needs would in practice be unlikely to be displaced towards Aylesbury. To that extent, the inclusion of the whole of South Buckinghamshire within the Central Buckinghamshire Housing Market Area inflates the quantity of unmet need which VALP should be expected to accommodate. But the quantity of unmet need for which VALP makes provision includes a figure for Chiltern and South Bucks combined so it is not possible to separate out a figure for the part of South Bucks falling outside the Central Bucks HMA.

117. The examination of the Wycombe Local Plan has resulted in the identification of an increase in housing supply within that authority. Examinations of local plans for Chiltern and South Buckinghamshire will not now take place because the Chiltern South Bucks Plan has been withdrawn. The outcomes for those areas can only be speculative. If it subsequently turns out that these areas can supply additional housing land so that the likely displacement of demand towards Aylesbury Vale does not in fact occur to the extent allowed for, that would not render VALP unsound because it is government policy to boost significantly the supply of housing. The plan would only be unsound if insufficient allowance were made. In the light of the information before me, it appears that the figure of 8,000 representing demand for dwellings in Aylesbury Vale likely to be displaced from other parts of the Central Buckinghamshire HMA represents the most appropriate figure in the light of the information currently available. With this figure for unmet need, the identified housing need for Aylesbury Vale would rise to 28,600 (in rounded terms).

118. The feasibility of accommodating this displaced demand was challenged on several grounds. Although Aylesbury Vale forms a separate sub-market within the overall Central Buckinghamshire Housing Market Area, the work done on identifying the Housing Market Area convinces me that it is a plausible location to which housing demands would be redirected if people cannot find the accommodation they seek in Wycombe, Chiltern or South Buckinghamshire. A second ground of challenge was the deliverability of the allocations proposed within VALP. I now turn to this issue.

Deliverability

119. As submitted, the plan implies a delivery rate of 1405 dwellings pa for the remainder of the plan period (after allowing for shortfalls in the first few years of the plan period). Representations expressed concern about the Council's ability to rise to the delivery rate implied, though, paradoxically, their suggested solution is to increase the number of allocations, and the implied delivery rate, still further.

120. Over the four years to April 2017, the Council delivered an annual average of 1231 new dwellings. In both 2014/15 and 2017/18 its submitted evidence base recorded that it exceeded the 1405 rate which would be required for the remainder of the plan period to meet the requirements of the submitted plan[33]. Its forward trajectory at the time of submitting the plan suggests that completions would continue to rise with an average of 1846 pa expected to be delivered for seven years 2019/20 – 2025/26[34]. This would still comfortably exceed the increased housing requirement implied in my recommended uplift to the OAN.

121. The trajectory, referred to in paragraph 3.78 of the plan was submitted as a separate, supporting document. But, as it was intended to use it, rather than an annual average delivery rate, as a reference for monitoring the plan, it is necessary that it be included within the plan itself. Modifications **MMs23** and **277** provide this and are necessary for effectiveness. In drafting its proposed modifications the Council originally went beyond what was necessary, including a projection of an identified and itemised five-year housing supply from a start date of 2018. This led to a number of representations questioning its reliability.

122. But, the Plan is being examined in relation to NPPF 2012. Unlike paragraphs 67 and 73 of the 2019 NPPF which require both a housing trajectory and an identified housing supply for the first five years of the plan period to be included as policies within the Plan, only the first bullet of paragraph 47 of NPPF2012, applicable to this examination, sets out a requirement for the Local Plan. It should meet the full, objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

123. The subsequent bullets advising that a local planning authority should identify and update annually a five-year supply of specific deliverable sites and illustrate the rate of housing delivery through a housing trajectory are silent on whether these documents should be included within the plan itself. The

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

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

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

124. If VALP's housing requirement is translated into an annual target and then applied retrospectively to the five years since the plan's start date of 2013, then performance will be recorded as not meeting that target for the past five years. Some would interpret this as meaning that the Council would be classified as having a record of persistent under delivery against its target. In consequence, it is said that it should be classed as an authority which should bring forward an additional 20% buffer to its annual housing targets. In turn, this would mean that the allocations in the plan as submitted would not demonstrate a five-year housing land supply. But, as noted a few paragraphs earlier[35], that under delivery has not persisted and so, only a 5% buffer would need to be included in its annual housing targets.

125. Moreover, I consider that retrospective application of targets in this way would be misdirected. The Council cannot seek to meet targets until they are set. They are not set until the conclusion of this examination and the adoption of the plan. At that time, the Council's annual average target will become the residual undelivered requirement for the plan period divided by the remaining years of the plan period. Before that time, its targets are calculated with reference to housing needs objectively assessed at the time in accordance with judgements of the courts. Thus correctly interpreted, the suggestion that the allocations in the submitted plan would not provide the basis for a 5-year housing land supply on adoption is unfounded.

126. Representations expressed concerns about the plan's reliance on large sites, citing 2016 research by Nathaniel Lichfield and Partners *Start to Finish* (which found that sites of 2000+ units only deliver 2.5 times as many dwellings per annum as a site of 500 dwellings), *a Report into the Delivery of Urban Extensions* by Hourigan Connolly dated February 2014, *Housing Delivery on Strategic Sites* by Colin Buchanan and Partners 2005 and a DCLG/University of Glasgow report of 2008 *Factors affecting Housing Build-out Rates*. It is generally reckoned that a site can deliver about 40-50 dwellings per annum per sales outlet[36]. But experience to date shows that sites in Aylesbury can exceed these delivery rates; Kingsbrook has two sales outlets but achieved an output of 219 completions in a year; Berryfields achieved 450 completions from four outlets. I can therefore be confident that the reliance on large sites does not make the plan unsound.

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

[35] In paragraph 120
[36] Housing Delivery Study for Buckinghamshire, paragraph 6.74 and Figure 31

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

128. That may be so but would be an improvement to the plan, not a modification necessary to make it sound. If it were the plan's intention that its housing requirement be delivered on an annually equal basis by averaging out its plan period requirement and setting that as an annual target, then the more agile approach of a strategy dependent on the delivery of a large number of small sites might have been appropriate. But, that is not what the plan sets out to do. It sets out to achieve its housing delivery over the plan period as a whole. For that reason, annual monitoring by reference to an annually averaged target, applying backlogs by means of the Sedgefield approach, would be inappropriate in the case of this plan. The use of the Liverpool approach, which the Council intends, would be more appropriate to the strategy of the plan. Part of modification [**MM23**], previously referred to, makes this clear. The most appropriate way of monitoring this plan would be by reference to its housing trajectory, which is what policy S9 (to become S8) proposes.

129. Representations also pointed to the burden of infrastructure which allocations around Aylesbury were expected to shoulder. This was specifically recognised in the Vale of Aylesbury Local Plan Viability Assessment carried out by the Dixon Searle Partnership for Aylesbury Vale District Council in August 2017.[37] Examination of the deliverability of individual sites does not lead to any conclusion that the infrastructure burden would impede their delivery. The Council is pursuing a programme of Site Delivery Statements agreed with identified developers for individual sites. Those submitted to the examination do not indicate that the infrastructure burden would impede their delivery. I conclude that VALP does not impose an excessive infrastructure burden.

130. At the time of VALP's submission there remained, in relation to a number of site allocations, issues with the Environment Agency and the water and sewerage undertakings concerning flood risk and infrastructure capacity, the latter partly related to recently introduced ways of requisitioning and funding increased capacity. These were resolved during the examination and result in a number of modifications which are necessary to justify the deliverability of the plan. [**MMs 41, 48, 55, 74, 82, 84, 101, 275, 276**].

131. The deliverability of individual sites is considered in a separate section of this report. Examination of those issues does not lead me to conclude that the plan as a whole, or the housing numbers proposed within it, would be

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

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

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

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

Conclusions on housing needs

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

- OAN 20,600
- Unmet needs from elsewhere 8,000
- Buffer for uncertainty 1,500
- Total 30,100

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

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

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

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

137. A number of the site allocations in VALP are uncontroversial but modifications are nevertheless necessary to reflect a change in circumstances since the plan was submitted (such as the development of a site or its withdrawal from availability). Paragraph 157 of the NPPF advises that Local Plans should be kept up to date and so, without the following modifications which bring specific allocations up to date the submitted plan would be contrary to national policy [**MMs 31, 49, 50, 51, 58, 62, 63, 64, 65, 66, 67, 68, 69, 90, 92, 93, 95, 96, 102, 103, 104, 286**].

138. As stated earlier, my report does not respond to every point or issue raised by representors. I report here only on those allocations where I am unconvinced by the Council's response to my initial questions or where a person making a representation exercised a right to be heard. Notwithstanding the limited number of allocations considered in this section, other allocations are the subject of modifications as a result of issues considered elsewhere in this report.

Allocation AGT1 South Aylesbury

139. Elsewhere in this report I remark on the extent to which VALP delegates policy requirements to SPDs and I recommend MMs to identify those elements which should properly be included in the plan itself. That recommendation applies with equal force to several of the site allocations which make reference to the need to produce an SPD or masterplan before delivery can commence. Allocation AGT1 is one such.

140. The allocation is in several separate ownerships. Coordination of access particularly for pedestrians and cyclists so as to ensure permeability across the allocation as a whole is necessary. So is identification of the location of facilities to be supported collectively by all the components of the allocation. But all those requirements need to be set out in the plan itself. The

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

141. Publication of these modifications has led to representations which have clarified the differences between the Council and the potential developers of this allocation. They include the application of green infrastructure policy and its definition, the need for community buildings, retail and gypsy and travellers' pitches and the capacity of the site. Whilst an SPD, whether prepared and imposed by the Council or prepared by developers and adopted by the Council, can elaborate on policy, only the examination of policies stated in a development plan can conclude that they are sound.

142. Whilst I have no reason to dispute the former County Council's assertion that full delivery of the whole allocation is dependent on the completion of the South East Aylesbury Link Road (SEALR) between Lower Road and Wendover Road, that should not prevent individual parcels of development proceeding to the extent that each can be supported by the actual road network available at the time. The intended alignment is known and should be shown on the policies map or within the allocation provisions so that individual developers can take account of it and other requirements of the plan in drawing up their schemes.

143. Having read the evidence and listened to the submissions at the April 2021 hearing session concerning this allocation, I am less convinced of the necessity of precluding any direct access to any part of the allocation from the SEALR. I agree with the Council's contentions that the SEALR is intended to provide a higher level of service than an all-purpose road with frontage access and that, in general, it makes sense to limit access points to fewer than two per kilometre. Nevertheless, the SEALR is just over a kilometre in length with roundabout junctions, rather than access points at either end and so care needs to be taken that, in applying the principle, which is generally sound, the result does not leave parcels of land inaccessible and incapable of development. That would be an unsound outcome. The dilemma is best resolved through the intended SPD or through the development management process and so I have adjusted **MM35** so that clause (d) of allocation D-AGT1 is less dogmatic.

144. One landowner has already indicated that provision can be made for a school and community centre within their scheme and there does not appear to be any dispute over the need for a school. The evidence base[38] identifies a need for a minimum of six additional community centres in the Aylesbury Strategic Settlement Area. It also shows[39] that the catchment for all centres covers the

[38] The Assessment of Open space, sports and Recreation Needs for Aylesbury Vale final report March 2017, paragraph 4.30
[39] Ibid paragraph 4.25

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

145. On the other hand it was made clear during examination hearing sessions that the requirement (criterion q) for the provision of on-site health facilities (including temporary buildings if necessary) was not justified but that a contribution to an off-site health facility to be provided on allocation AGT3 to serve all three allocations AGT1, AGT2 and AGT3 is justified. A modification is necessary to give effect to this.

146. I am satisfied with the Council's explanation that areas which are known to flood within the allocation will be reserved for open space purposes and other uses compatible with their flood risk status. In response to concerns about the plan's compliance with national policies, the Council has reviewed the plan's requirements concerning open space and green infrastructure (discussed in another section of this report). There is no sound reason to except allocation AGT1 from these provisions so as to classify private gardens as falling within the ANGSt definitions adopted in policy I1.

147. In common with many allocations, modifications are necessary to clarify the new arrangements for funding water and sewerage infrastructure. I deal with the gypsy and traveller requirement elsewhere in my report but I reach a conclusion similar to that on community centres; namely that the allocation should make its proportionate contribution to the delivery of sites required.

148. I accept that although the allocation requires the retention of a buffer of open space to prevent coalescence with Stoke Mandeville the separation of that settlement from Aylesbury will be reduced. However, I share the view expressed by the Inspector who examined the Core Strategy in 2010 that by its nature Stoke Mandeville is a larger settlement which would remain as a significant entity with greater critical mass to withstand overpowering encroachment and so the reduced separation which would result from the retention of a buffer of open space would be a sound outcome.

149. In its note to me following the April 2021 hearing session relating to this allocation, the Council explains how it arrived at the capacity indication of 1,000 dwellings, making the point that the development on site should not be led by numbers but rather that the numbers should be an outcome of the policy criteria. Within that explanation, I note the potential for increasing capacity through the use of mixed development to provide a local centre. The Council does not point out, but I am aware, that it is common practice in parts of the country to provide school buildings as part of mixed use developments or that school playing fields can be managed so as to be shared with the public and so contribute to the provision of green infrastructure. I am therefore satisfied that there is considerable potential for increasing the number of dwellings to be provided beyond the 1,000 indicated by the Council's calculations and that the modification to include the words "at least" is needed to reflect government policy to boost the supply of housing. With the

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

Allocation AGT2 south west Aylesbury

150. Many of the issues relating to this allocation are similar to those concerning AGT1 and I will not repeat the arguments here. Similar modifications are required to move policy from supporting text into the allocation policy itself [**MMs 36, 37, 38, 39, 40 and 41**] so as to be effective. The issues that are unique to this allocation are the degree to which HS2 is likely to present a constraint to development and the degree to which heritage considerations should present a constraint to development.

151. At the southern end of this allocation and at its northern extremity, the route of HS2 would be in a cutting. This would limit noise spread. By contrast, it passes the central, and narrowest, part of the site on an embankment. It is certainly true that, as a result, a considerable extent of the allocation site would require sound insulation to be provided but that is not uncommon in other locations when housing is developed near to a main transport artery. Moreover, the garden city concept requires 50% of the site to be laid out as green infrastructure in any event so the actual additional limitation imposed by the proximity of HS2 would be minimal and not a reason to declare the allocation unsound.

152. At its northern end, allocation AGT2 abuts the A418 Oxford Road. On the opposite side of Oxford Road is parkland associated with Hartwell House, a Registered Historic Park and Garden and Conservation Area. Paragraph 129 of the NPPF advises that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset and take this assessment into account when considering the impact of a proposal on a heritage asset.

153. Although the existence of Hartwell House historic park and garden is referenced in supporting paragraph 4.43, and is clearly shown in Figure A of the Technical Annex to the Sustainability Assessment Report, there is no indication in the HELAA for the relevant land parcel (STO016) that any heritage assessment was made in relation to allocation AGT2.

154. The significance of the heritage asset is that it represents an eighteenth century landscape park and pleasure grounds. It would originally have been set in an agricultural landscape and, as the listing entry records; it is still set within agricultural land to the west and south. Part of this comprises allocation AGT2. But much of that agricultural setting has already changed. A golf course covers parts of the two arms of the outer park and the pre-1945 agricultural setting to the east has been lost to development, a road replacing a brook as the eastern boundary of the parkland.

155. Although the agricultural land to the south is part of the setting of the heritage asset, the connection is tenuous because the south east boundary of the park is formed by a 2km long rustic stone wall of Portland limestone. Behind it is a tree belt which, as the listing entry relates, is important in screening the park during the approach from Aylesbury. Another narrow belt of trees flanks the south side of the road, creating an informal avenue. The setting of an asset is

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

156. In any event, the construction of HS2 will radically alter this setting and the way one experiences the heritage asset because it would slice through the registered park just slightly to the east of the boundary between the inner and outer park. It would cross the Oxford Road on an embankment, necessitating the diversion of the road to the south, largely eliminating any connection between the remaining part of allocation AGT2 and the severed halves of the registered park. It is within this context that the effects of the proposal on the setting of the heritage asset need to be appraised.

157. The site is allocated not just for housing but also for strategic flood defence and surface water attenuation, amongst other things. The developer's current masterplan for the site indicates a wetland park area at the north end of the site, abutting Oxford Road and its realignment. As that is a low part of the site, I concur that that is a likely outcome in any approved layout of the site. The change from agricultural land to wetland parkland, severed from the heritage asset by the HS2 and the realigned Oxford Road would have such a marginal effect on the way the heritage asset is experienced that I consider it to be of no consequence and so conclude that this allocation is sound, even though it appears to have been put forward without a prior heritage assessment.

Allocation AGT3 Aylesbury north of A41

158. Many of the issues relating to this allocation are similar to those concerning AGT1 and I will not repeat the arguments here. Similar modifications are required [**MMs 42, 43, 44, 45, 46, 47 and 48**] both to bring the details of the allocation up to date and to transfer policy from supporting text into the policy of the allocation itself so as to be effective. The issues that are unique to this allocation are whether the allocation has been correctly assessed in relation to flood risk, whether the extent of "not built development" notation on the policies map is justified and whether the traffic impact concerns of a previous decision by the Secretary of State have been overcome.

159. Advice in the NPPF is that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk but, where development is necessary, making it safe without increasing flood risk elsewhere. Technical guidance on flood risk published alongside the NPPF sets out how this policy should be implemented.[40] It involves a Strategic Flood Risk Assessment, the application of the Sequential Test and, if necessary, the exception test. Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property by applying a sequential test and, if

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

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

160. A level 2 Strategic Flood Risk Assessment for Aylesbury Vale has been carried out. Four sites within that assessment fall within allocation AGT3; sites BIE022, WTV017 and 018 and AST037. The maps for these sites demonstrate that the area annotated on allocation AGT3 for "not built development" largely coincides with the areas of identified flood zones 2 and 3 on those assessments. Allocation criterion (k) requires flood zones 2, 3 and 3a (recognising climate change) to be preserved as green space with built development restricted to flood zone 1. It is thus apparent that allocation AGT3 complies to that extent with the injunction to direct development away from areas at highest risk.

161. But the allocation includes a number of elements. In addition to those which would clearly fall within the scope of the description of "built development" is the provision for a "distributor road connecting with the ELR(N) and the A41 Aston Clinton Road."

162. The alignment of this road is nowhere shown in the submitted plan. In another section of my report I consider whether it should be. But, in any event, it is clear that in order to connect the two specific points mentioned, it would have to pass through or across areas identified as flood zones 3a and 3b.

163. A road which is described as a Strategic Link Road would clearly fall within the description of "Essential Infrastructure" for the purposes of Table 2 of national Guidance relating to flood risk and coastal change. In accordance with that advice, it should only be included as a proposal in the plan if it passes the exception test. As noted above, this has two parts. The claimed sustainability benefit to the community for this project is stated in the sixth bullet of paragraph 4.65 of the plan; reduced congestion and improved quality of the town centre environment. Greater detail is given in Paragraphs 6.5.11 and 6.5.12 and the Technical Annex of the Sustainability Assessment Report describing the consideration which was given to the option of including allocation AGT3 within the plan's spatial strategy. It recognises that a new link road through the Woodlands (AGT3) site would be of particular strategic importance. I examine the justification for this proposal elsewhere in my report and conclude that it is sound.

164. The second part of the exception test is that the proposal will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. National Guidance also advises that in flood zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood and that in flood zone 3b, essential infrastructure that has to be there and has passed the Exception Test should be designed and constructed to remain operational and safe for users in time of flood, result in no net loss of

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

165. I therefore conclude that the allocation has been correctly assessed in relation to flood risk. However, as noted earlier, the allocation does not include any specific alignment for the Strategic Link road proposed. NPPF paragraph 152 advises that significant impacts on any of the dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. NPPF paragraph 182 advises that to be justified a plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. I consider these matters further in relation to the road proposal element of allocation AGT3 in another section of this report.

166. As noted earlier, the area of land identified at risk of flooding through the Flood Risk Assessment does not precisely coincide with the area identified in the allocation as "not built development". One particularly noticeable discrepancy lies in the area to the north of Weston Mead Farm where an area, apparently not at risk of flooding has been designated as an area of "not built development".

167. Paragraph 1.23 of the plan explains that areas marked as "not built development" are so designated either because of the findings of the Flood Risk Assessment or because of the recommendations of the Strategic Landscape and Visual Impact Capacity Study. The former does not indicate that this piece of land should not be developed. The latter identifies that the entire site is developable other than a small strip along the Bear Brook.[41] The Council's response during the examination introduces a third consideration, namely the requirement for 50% of a site to be green infrastructure and the concept of the Aylesbury Linear Park shown diagrammatically in paragraph 4.21 of the plan but not included in the submission policies maps or insets. Although this additional consideration should apply equally to both halves of the Weston Mead Farm site, it appears that as part of a recent appeal submission a concept plan has been submitted by a developer indicating that, in order to comply with the requirement for 50% of a site to be green infrastructure, the northern part of the site would be so retained. This demonstrates that the Council's proposals are sound, albeit, not for the reason stated in paragraph 1.23 of the Plan. Nevertheless, modification **MM48** is adjusted so that criterion (s) would reflect the conversion potential of buildings already on that part of the site.

168. A previous appeal decision in relation to the development of the Hampden Fields (AGT4) site was dismissed over concerns relating to its effect on a junction known as the Walton Street gyratory. However, subsequent work has established that with that development in place an increased total flow through the gyratory junction can be accommodated with increased queuing

[41] Commentary and map for land parcel WTV017

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

Allocation NLV001 Salden Chase (South-West Milton Keynes)

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

Allocation WHA001 Shenley Park

170. This allocation was put forward by the Council in its proposed modifications to the plan, published in November 2019. The Council was accused of not considering all reasonable alternatives in identifying increased allocations in close proximity to Milton Keynes. But, the phrase all reasonable alternatives does not equate to all conceivable alternatives. The modifications should form a seamless part of VALP; they do not form a separate plan prepared from scratch. The HELAA in the Council's original evidence base considered a very wide range of possible options. Consequently, I find it entirely reasonable that the Council should have revisited the site selection process in the HELAA in its original evidence base to identify previously short-listed options for re-appraisal. It is also reasonable that its choice should have been consistent with the overall spatial strategy of the plan, which is to rely on a few, large allocations which can, of themselves provide supporting infrastructure without the need to coordinate contributions from a larger number of smaller sites.

171. Representations also suggested that the chosen site might not be viable and that with the constraints placed upon it in the criteria attached to the allocation, might not have the capacity to deliver. Although the Council's viability study concludes with a deficit for the chosen allocation, the size of the deficit lies well within the margins of error of the appraisal method so does not demonstrate unviability. Subsequent movements in outturn values and costs would reverse the finding, according to the study's author.

172. Comments made during the hearing session by an officer of the Council to the effect that housing development would be restricted to the northern half of the allocation give credence to representations alleging that, if so restricted, the allocation would not have the capacity to deliver the housing and supporting facilities required. But the point was contradicted by other Council officers and I observe that the allocation as drafted in the Council's proposed modification, which I endorse, contains no such restriction.

173. It is fair to say that paragraph 5.1.25 of the BMD Landscape and Visual Capacity Comparison Assessment (Examination Document 210A) advises that "Development within the southern parcel would represent an unacceptable extension of development into the countryside and visible from the wider

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

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

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

Allocation BUC043 Moreton Road, Buckingham

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

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

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

178. Time moves on. The Buckinghamshire HEDNA, advising on the establishment of an Objectively Assessed Need and a Housing Requirement for Aylesbury Vale reported in December 2016 but, at the time of the Secretary of State's decision, VALP was at an early stage in the process and so was given very limited weight in the decision. Subsequent to the Secretary of State's decision, the HEDNA was updated and the Council has carried out a Sustainability Assessment of a number of spatial development options in which this site was a variable, not included in 5 out of the 9 options considered. The Council chose for submission an option which includes the site.

179. As noted elsewhere in the section of this report dealing with the spatial development strategy, Buckingham currently has about 7% of the district's population. The three sites in Buckingham allocated in VALP represent 7% of all the allocations in the plan but, taking account of existing commitments, including those in the made neighbourhood plan, 8% of the development expected to take place in the district. It appears to be no more than proportionate to Buckingham's position in the settlement hierarchy.

180. As noted elsewhere in this report, I have found the Council's spatial submission strategy broadly sound subject to reconsideration of the disposition of allocations in the north of the district. But I have also found that the Council's housing requirements have been underestimated and that additional allocations need to be identified so as to meet the Council's housing needs. I therefore conclude that the allocation of this site is necessary to meet housing requirements which were not identified at the time the Buckingham Neighbourhood Plan was made.

181. The ability of the market to absorb the quantity of development proposed in the three allocations in Buckingham is questioned in relation to all three allocations as it is in relation to the overall quantity of development proposed within Aylesbury Vale by VALP. I consider this issue in the part of my report dealing with housing numbers in general. There is no specific consideration in relation to the Buckingham sites which would lead me to a different conclusion in their cases.

182. The effects of the development on highways of this and other allocations in Buckingham have been assessed during the Inquiry into the called-in application and in the County's Local Plan Modelling and in the Buckingham Transport Strategy and found acceptable subject to a number of infrastructure upgrades. However, these are neither specified within the allocation provisions nor as discrete proposals in their own right. That is an unsound omission from the plan which needs to be corrected by clause (l) of modification **MM82**.

183. In response to representations made to this and other allocations in Buckingham, the Council has referred to the Infrastructure Delivery Plan. This is part of VALP's evidence base but is not part of VALP. That is an unsound omission from the plan which needs to be corrected by modification **MM210**. Insofar as developments are to be expected to deliver the Infrastructure prescribed, then modifications to VALP allocations are necessary to specify these requirements. They are listed in the Site Delivery Statement submitted during the examination.

184. In common with a number of allocations in the plan, all three allocations in Buckingham include references to the need to align development with investment by the utilities undertakings in water and sewerage provision. The preparation of the plan has coincided with a change in the way such upgrades are requisitioned and funded. Both Anglian and Thames Water companies have clarified the way the new system operates and have suggested modifications to a number of allocations in the plan to make it clear that the need to upgrade such provision does not make the allocations unsound and is not a precondition or requirement of planning permission requiring funding by the developer but that the programme of development should be aligned with the infrastructure investment which the utility companies are required to undertake to align their capacity to the development proposed in the plan. I agree that these modifications [**MMs 82, 84, 276**] are necessary to make the position clear and effective.

185. The point is made in relation to this allocation that, as Buckingham has evolved, the centre of gravity of convenience shopping and some services, such as health centre provision has moved to the south of the town. Nevertheless, town centre convenience stores remain and so the point does not demonstrate that the allocation would be unjustified.

Allocation BUC046 Land off Osier Way, Buckingham

186. The same considerations as to the relationship with a made neighbourhood plan apply to this site as to allocation BUC043 except that, in relation to this site, there has not been a recent Secretary of State decision refusing planning permission. So do the same points concerning market absorption, infrastructure requirements specified in the Buckingham Transport Strategy and the Infrastructure Delivery Plan and water and sewerage capacity enhancements.

187. Specific to this allocation is the concern that its development would restrict neighbouring employment growth but the Council points out that this is provided for by a nearby 10ha allocation for employment development in the made Buckingham Neighbourhood Plan.

188. The Council accepts that some detailed modifications to criteria (d) relating to highway access and the deletion of criterion (e) relating to ecological management are necessary to reflect the reality of the situation [**MM84**]. I concur.

Allocation BUC051West Buckingham

189. The site is a reserve allocation in the made Buckingham Neighbourhood plan and so its potential access and impacts on landscape have been assessed and found acceptable. Otherwise, the same considerations apply to this site as to allocations BUC043 and BUC046 concerning market absorption, and infrastructure requirements specified in the Buckingham Transport Strategy and the Infrastructure Delivery Plan.

190. Particular issues concerning this allocation are that a site delivery statement affirms that multiple ownership of the site would not slow its delivery. The VALP evidence base has assessed the capacity of the site and confirms its consistency with the exclusion of development from flood zones 2 and 3.

191. It emerged during the examination that delivery of this site would be dependent on the construction of a Buckingham Western Relief Road, not included within the site particulars or shown independently within VALP. Further work by the Council affirms that the scale of development on this site would not be sufficient to finance the construction of the Western Relief Road.[42] This consideration, together with a reconsideration of the distribution of housing allocations within the north of the district, focusing more allocations in the vicinity of Milton Keynes, leads to a Modification deleting this proposed allocation from the plan [**MM83**] as undeliverable and therefore, unjustified.

Allocation HAD007 – Haddenham, land north of Rosemary Lane

192. The main issue with this allocation is whether it is sound in relation to its effects on a heritage asset; the Haddenham Conservation Area. Although the setting of a conservation area is not a statutory consideration, paragraph 129 of the NPPF establishes government policy that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset, and take that assessment into account when considering the impact of a proposal on a heritage asset.

193. The eastern end of the south-eastern boundary of this allocation is contiguous with the northernmost boundary of the Haddenham Conservation Area and so will affect its setting. Consequently, its effect on the significance of the heritage asset should be assessed.

194. It is noticeable that, of the 24 sites associated with Haddenham assessed in the Housing and Economic Development Land Availability Assessment Report January 2017 (the HELAA), five specifically mention their effect on the Conservation Area. Three are found unsuitable for development. In the HELAA, despite this allocation's contiguity with the Conservation Area the relationship is not mentioned. It is not unique in this respect since the

[42] Examination document ED257

HELAA's appraisals of other sites[43] having common boundaries with the Conservation area also do not mention the relationship. However, Heritage is a specific category analysed in the Sustainability Assessment Report which covers this site in detail and the Conservation Area is specifically mentioned in the text (section (g)) of the allocation in VALP itself, so it cannot be said that the relationship has gone unnoticed or unconsidered.

195. The question then becomes whether the relationship has been soundly considered. The characteristics and significance of the Conservation Area are fully analysed in the Council's Haddenham Conservation Area report. Its significance is as a polycentric agricultural village with a linear form in which the use of witchert (a form of rammed earth) as a construction material features strongly.

196. As the Conservation Area report notes, the use of witchert in the construction of boundary walls and buildings is arguably the most significant element in defining the character of the village but it also notes that a key characteristic of Haddenham is the series of enclosed spaces of irregular shape and varying size spread throughout the village. These latter are unaffected by the allocation. Indeed, its requirement for a landscape buffer to be required between the existing dwellings and the new development could lead to the creation of a further such enclosed space, consistent with the character of the Conservation Area, though lying outside it.

197. Two views of the long witchert wall at the rear of properties in Rosemary Lane are seen across the eastern part of the allocation site. Insofar as they allow a characteristic feature of the Conservation Area to be appreciated, they need to be taken into account in considering proposals for the site. Provision (f) of the allocation appears to do that by requiring a landscape buffer between the existing dwellings and the new development. It is represented on the submission policies inset map by the annotation of an area of not built development. The proviso and annotation could be improved by making specific reference to the views mentioned in the Conservation Area report but that would be a matter of improvement to the plan; it does not strike at the soundness of the allocation. In any event, the western two-thirds of the allocation is unaffected by this consideration.

198. The potential developer of the site suggests that the north-south extent of the site would make the achievement of an adequate landscape buffer to preserve the setting of the witchert wall difficult in addition to the pedestrian and cycle access to the station through the adjoining approved airfield and Dollicott developments as well as the delivery of 315 dwellings which the allocation also requires. I concur that the potential pedestrian and cycle linkages to the west are important to secure the sustainability credentials of this allocation because the limitations of the existing footpath access onto Rosemary Lane and the circuitous vehicular access specified via Churchway would otherwise encourage the use of means of transport less sustainable than walking or cycling. The

[43] HAD002, HAD010, HAD015, HAD026

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

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

Allocation HAL003 RAF Halton

200. In an earlier version of VALP, it was proposed to delete this site from the Green Belt in which it lies. That is not now proposed because the Council accepts that there is no justification for it. For that reason, it is right that the allocation covers only the previously developed part of the RAF landholding and not the whole estate. However, there remain hints in VALP as submitted that a future review of the plan will revert to the suggestion of deleting land from the Green Belt. These hints are inappropriate and unjustified and so should be deleted from the plan [**MMs 16 and 85A**]. The allocation site remains within the Green Belt.

201. Critics of this allocation allege that it would be contrary to national Green Belt policy, set out in NPPF paragraphs 87 and 89. But NPPF paragraph 89 allows for the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building. It also allows for the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces. It also allows for the partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. NPPF paragraph 90 allows for the re-use of buildings provided that the buildings are of permanent and substantial construction and provided the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within the Green Belt. There is therefore considerable potential for the development, redevelopment and reuse of an existing developed site within the Green Belt consistent with government policy.

202. Much of the criticism of this allocation was directed at the Defence Infrastructure Organisation's document *Vision for Development at RAF Halton*, published in June 2018. But this is a document which neither forms part of nor is endorsed by VALP.

203. Paragraphs 4.134 and 4.135 of VALP correctly recognise the heritage assets, both designated and other, which characterise the site. The proposed closure of the RAF base, commencing in 2020 and due to be complete by 2022[44] clearly puts the future of these designated and non-designated heritage assets at risk. NPPF paragraph 126 advises that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats. It is therefore fully justified for the plan to be positively prepared in setting out a strategy for the protection and re-use of these assets even though the outcome may not come fully on-stream until the later years of the plan period. However, as the Council freely accepts in its response to my Q21, that is not what allocation HAL003 does in its present form. A modification to add specific criterion (i) relating to the heritage assets should be included in the policy [**MM88**].

204. The closure of RAF Halton was announced in November 2016, so the Council had fifteen months before the submission of VALP in which to prepare its proposals for the allocation of the site. It is perhaps not surprising that its preparations have been somewhat rudimentary and include inconsistencies as they have been refined over time[45] but, for the reasons explained above, I consider it an indication that the plan has been positively prepared that the allocation should be made. It would have been unsound for the plan not to contain specific proposals for a heritage asset so clearly under threat.

205. The suggestion is made, justified by repeated references[46] in the Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan September 2017 by AECOM that the allocation in VALP of Halton Camp is an alternative to the allocation of a site at Shenley Park, just outside Milton Keynes. It is also implied in that criticism that, if the allocation of Halton Camp is shown to be unsound, then the alternative allocation at Shenley Park would automatically follow. But such is to misunderstand the purposes of the Sustainability Assessment; it is to inform the determination of a preferred strategy for VALP but it does not itself determine the preferred strategy. As the final sentence in Appendix III of the Sustainability Appraisal makes clear, the intention is for the Council and stakeholders to take its findings into account when considering how best to 'trade-off' between competing objectives and establish the 'most sustainable' option. The way in which the Council has made that "trade-off" is clearly stated in paragraph 8.2.2 of the Sustainability Appraisal. It does not depend on the score of any one site but on the characteristics of the options overall.

[44] As at the time of submission of the Plan, now known to be 2025.
[45] For example, paragraph 2.20 of the Council's topic paper on Housing records an initial broad assessment establishing that there are 44 barrack blocks capable of conversion whereas the response to my Qs66 and 69 refers to 36. Representation 2038 from respondent 27869 Savills on behalf of Crest Strategic Projects reports errors in the Sustainability Appraisal relating to RAF Halton. Without endorsing those in this footnote, it is clear that the fact they can be claimed suggests that the Council's appraisal has been rushed.
[46] In Appendix III – reasonable spatial strategy alternatives, page 136 onwards

206. Moreover, it is clear, from the different impacts which each of the two sites would have on each of the twelve assessment criteria evaluated in Appendix III of the SA that they are only alternatives in terms of scale, they do not substitute for each other in almost every other respect, not least because of their differing timescales of delivery and different geographic locations at opposite ends of the district. The different options evaluated either include or exclude the two sites as may be. At least one option excludes both sites. As is made clear elsewhere in this report in discussion on the spatial strategy and on the housing requirement, I recommend that both sites be included in the plan.

207. The scoring system used in the SA is a matter of judgement. Although I might come to a different judgement in a particular instance, as do some of the representations made, it does not follow that the judgement made in the SA is thereby unsound; it is simply different. An SA informs but does not direct the content of a plan.

208. This allocation might have been scored more highly for sustainability because of its potential effects on Listed buildings, registered parks and gardens or scheduled monuments. The SA sees the proposal as a threat to the heritage assets. But the proposal also represents an opportunity for a heritage-led scheme to secure the retention and conservation of those assets which are otherwise likely to be at risk. But that potentially different perspective does not make the whole SA unsound, let alone the plan to which it relates. Rather, it reinforces the conclusion that allocation HAL003 is justified and therefore, sound.

209. An allocation adjacent to Aylesbury is proposed for development of up to 3,000 dwellings. It is of similar extent to the allocation proposed at Halton for 1,000 dwellings. Given the Green Belt and heritage constraints of RAF Halton and notwithstanding the rudimentary nature of the study of conversion and redevelopment potential that has been made, I consider that 1,000 homes within the plan period is a reasonably justified ball-park figure to apply to the site.

210. As a previously developed site, the allocation has a history of existing traffic generation and so appraisal has only to consider the changes which would be brought about by the redevelopment. There is no evidence to challenge the former County Council's reported assessment that the replacement of the existing camp operations by 1,000 houses did not raise any significant concerns which could not be met by local mitigation measures which are specified in the allocation criteria.

211. I note the observations made in representations about the nature of public transport and other sustainable transport modes to and from the site and that these are no more than adequate but I take the view that a scenario which does not involve the re-use and redevelopment of the site with a comparable quantity of development to that presently existing is not credible. That carries with it implications for the provision of transport facilities which appear to be adequately provided for in the criteria attached to the allocation in the plan.

212. The Council accepted at the April 2021 hearing session, and I agree, that the reference to green infrastructure in the allocation's site-specific requirements

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

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

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

214. This allocation is an example of a site proposed within a neighbourhood plan area but not through a neighbourhood plan. Winslow was one of the first neighbourhood plans in the country to be made. Time has now moved on. As noted elsewhere in the section of this report dealing with the spatial development strategy, Winslow currently has about 3% of the district's population. This site represents 5% of all the allocations in the plan but, taking account of existing commitments, including those in the made neighbourhood plan, just 4% of the development expected to take place in the district. That may represent growth of 55% over the plan period but when district-wide growth is 40% and is concentrated in the six strategic settlements which include Winslow that does not make the allocation unsound.

215. Investment in the provision of a rail link to Winslow would progress in tandem with the development proposed. Improved pedestrian connections with the rest of the town form part of the proposal. Transport modelling shows no more than slight increases in travel times in the town as a result of the development proposed, not requiring mitigation.

216. The Infrastructure Delivery Plan notes that the population increase resulting from the development proposed at Winslow would not justify any additional sports hall or swimming pool provision. As noted elsewhere in this report, there is an inconsistency between the Infrastructure Delivery Plan and VALP in that the former asserts that any new development sites at Winslow will be expected to contribute to a new clinic at Norden House, whereas VALP allocation WIN001 does not. Like other inconsistencies between VALP and the Infrastructure Delivery Plan, the inconsistency requires correction. In preparing its modifications, the Council does not include any requirement for a contribution to a clinic at Norden House but instead reduces the expected delivery of the site from 585 homes to 315, thus reducing its potential to make a contribution so the correction needs to be made to the IDP.

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

Allocation STO008, Land south of Creslow Way, Stone

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

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

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

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

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

Allocation CDN003 Dadbrook Farm, Cuddington

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

Allocation ICK004 Land off Turnfields, Ickford

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

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

224. At one point during the examination of VALP, the former District Council proposed to delete this allocation in the light of advice received from the former Buckingham County Council concerning the feasibility of achieving access to the site. Following further advice from the County Council as highways authority the District Council reviewed that decision and withdrew the suggested modification to delete the proposal. It therefore remains for consideration and examination in the submitted plan.

225. This about-face took place at such short notice before the hearing session in July 2018 that many people who had made representations about the allocation did not receive notification in time to attend the hearing session. So that they were not disadvantaged, I held a further hearing session in April 2021 at which it was apparent that the allocation was mightily opposed. Sheer weight of opposition does not of itself necessarily mean that the allocation is unsound but it has identified a large number of issues which need to be examined.

226. Many of the considerations which apply to the three Buckingham allocations (BUC043, BUC046 and BUC051) apply to this allocation, except that it is outside the Buckingham Neighbourhood Plan area. These are the points concerning market absorption, infrastructure requirements to deal with traffic growth specified in the Buckingham Transport Strategy and the Infrastructure Delivery Plan and water and sewerage capacity enhancements. My

conclusions on those matters in relation to this site are the same and need not be repeated. See previous sections of this report headed *Allocation BUC043 Moreton Road, Buckingham, Allocation BUC046 Land off Osier Way, Buckingham and Allocation BUC051West Buckingham.*

227. Considerations which are unique to this allocation are its size in relation to Maids Moreton, the extent of the settlement's supporting infrastructure and hence, its position in the settlement hierarchy and a disparity between the size of the allocation and with that described in policy S2(h) and what would be allowed for an unallocated site proposed in accordance with policy D2(1). The allocation had been identified as not suitable in the HELAA 2015 but found suitable in a later edition and had been identified as the least suitable site in the village in the 2017 Sustainability Appraisal, reflecting a lack of local employment (so leading to commuting but without adequate transport infrastructure), its status as a greenfield site (so leading to impacts on wildlife), as Best and Most Versatile agricultural land and an increase in flood risk. Representations alleged that there would also be an impact on heritage assets.

228. If analysed as a freestanding settlement, the facilities which Maids Moreton enjoys would barely qualify it as a medium village in the Plan's settlement hierarchy. In terms of dwellings the parish is just within the top quartile of settlements by size within the plan area. Before the Covid-19 pandemic there were a couple of bus services but collectively they fell short of an hourly frequency and it has effectively none now (but with the potential for one to be provided should development of this allocation proceed). It has a pub but no post office, pharmacy nor even a corner shop. It has a place of worship, a village hall and a well-equipped recreation ground but only an infants' school (shortly to be expanded into a primary school) and pre-school facility, little employment and no doctor's surgery.

229. But, it is not a free-standing settlement. Residents of Maids Moreton clearly see themselves as separate from Buckingham but, to an independent observer, the two settlements coalesce. Although Buckingham Rugby Union Football Club's grounds to the west and agricultural land to the east cause a break in the continuous line of development along the main A413 and the name of the road changes from Moreton Road (in Buckingham) to Duck Lake (in Moreton), there is a continuous line of development linking Moreton and Buckingham without a break along the alternative route of Church Street, Glebe Terrace and Avenue Road. To an outsider, coalescence between the two settlements has already occurred and, in practical terms of urban landscape, supporting infrastructure and of their capacity to support development, Maids Moreton and Buckingham can draw on each other's resources. Moreton hosts the Buckingham Rugby Union Football Club which offers a facility serving an area much wider than the village alone. Buckingham provides retail facilities, health facilities and secondary schools at a distance of about a mile and a half from Maids Moreton.

230. In that light, it is both sound and reasonable to evaluate allocation MMO006 as one of a series of potential allocations in and around Buckingham. Others (BUC043 – 130 dwellings, BUC046 - 420 dwellings and BUC051 – 300 dwellings) have been discussed earlier. As such, and notwithstanding the vacillating advice of the HELAA and Sustainability Appraisals the number of

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

231. Like many greenfield sites, the allocation would extend built development further into the countryside but no further than has been committed at the adjoining site known as MMO005 (not an allocation within the Plan). Criterion (b) of the policy as submitted, together with the extent of land shown as "not built development" on the submission policies map inset for Buckingham and Maids Moreton would limit impact on the countryside and so, needs no modification to be found sound. Criterion (f) seeks a net biodiversity gain from the allocation. Whatever the merits or demerits of the biodiversity studies associated with the current planning application, which are not for me to consider, in my experience it is not difficult for a new development to be able to demonstrate a net biodiversity gain over the baseline of land in agricultural production and so that consideration does not present itself as a ground for finding the allocation unsound.

232. Much land around Buckingham is Best and Most Versatile agricultural land and so, if growth at Buckingham is to be accommodated at all it is inevitable that some loss would occur. I have no reason to question the Council's advice that alternatives offer no advantage in terms of using poorer quality land.

233. Any development of a greenfield site carries with it a risk of increased surface water flooding because of faster run-off from hard surfaces but the risk is usually dealt with during consideration of a planning application. The submitted Plan's policy for allocation MMO006 includes criterion (e) which would require the submission of a surface water drainage scheme.

234. The former District Council's Heritage adviser was consulted on the sites included in the HELAA January 2017, as paragraph 4.21 of that report attests. Sites were frequently classified as unsuitable on account of their impact on heritage assets, including sites MMO002, MMO007, MMO009 and MMO012 in Maids Moreton itself. I have no reason to doubt that an adequate heritage assessment of this site was made during the preparation of the plan.

235. Discussions on access have been resolved to the satisfaction of the highway authority. They were explored further during the April 2021 hearing session during which it became apparent that there were discontinuities between transport advice given during the preparation of the Plan and that given during the concurrent consideration of a planning application on the site. In coming to a view on the soundness or otherwise of the Plan, I cannot ignore the advice that has been given in relation to the planning application, although the latter is not for me to determine.

236. Following the July 2018 series of hearing sessions, I asked the Council to identify and make explicit within the plan proposals for transport infrastructure which were implicit within many of the Plan's housing proposals. The outcome for Aylesbury is discussed in another section of this report. In complying with my request, the Council commissioned further work into the impacts of development proposals on the Buckingham highway network.

237. It is clear from this further work that the Council faces very difficult decisions in guiding the future development of Buckingham. Both for its own future prosperity and as the second largest settlement within the plan area, the town needs to accommodate its proportionate share of Aylesbury Vale's growth. But that growth brings with it traffic growth over and above that which occurs anyway and so puts stress on the town's historic highway network.

238. Buckingham's transport system is constrained by a few junctions of limited capacity within the town's historic core. The highway modelling work which the Council has carried out shows that because of its location on the west side of town, traffic generated as a result of allocation BUC051 would unacceptably overload those junctions unless relief were to be provided by a new road which the development itself could not fund. As reported earlier, allocation BUC051 is deleted from the plan for that reason.

239. By contrast, allocations BUC043, BUC046 and MMO006 could each fund minor improvements to the junctions through contributions to the Buckingham transport Strategy already referred to and also would add load to those junctions to a lesser degree because the likely main objective destination is Milton Keynes to the east of Buckingham and alternative routes, avoiding the town centre, are available. Those alternative routes include the use of Mill Lane (also known as College Farm Road) through Maids Moreton. The outcome would not be congestion-free but congestion would be tolerable and so not amount to a residual cumulative impact that would be so severe as to prevent development, whilst at the same time accommodating proportionate housing growth around Buckingham.

240. I acknowledge that advice given in relation to the current planning application to develop the MMO006 allocation gives the impression that traffic calming measures will be imposed on Mill Lane (College Farm Road) and that these traffic calming measures would dissuade traffic from using the roads so treated. Be that as it may, I was given explicit assurance by the Council's representative at the hearing session that my understanding was correct that the traffic calming measures were intended to make sure that the roads concerned would accommodate the traffic generated from the MMO006 allocation in a safe way. Certain aspects of the measures envisaged would afford a clear increase in capacity at the junction of Mill Lane (College Farm Road) with the A422 Stratford Road but it was also made clear that such a capacity increase would only be implemented as a contingency if, contrary to the Council's expectations, an issue arose in practice.

241. The shifting sands of analysis and policy (identification as not suitable, then as suitable in successive drafts of the HELAA, categorisation as worst option for the village in the SA, inclusion in the submitted plan, then exclusion as a proposed modification, then re-inclusion, together with the discontinuities of transport advice) have clearly undermined local public confidence in the planning authority. Nevertheless, having examined the matter at considerable length and in considerable detail, I am convinced that, given the difficult decisions which the Council has had to face in determining Buckingham's future and taking all matters together in the round, this allocation is positively prepared and justified, although a modification is necessary [**MM101**] to make the allocation effective and consistent with government policy by reflecting the contribution which the allocation will need to make to the resolution of

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

Allocation QUA014-016 Land adjacent to Station Road, Quainton

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

Allocation EDL021 land off Slicketts Lane, Edlesborough

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

Key employment sites

244. In the light of representations made, I have also considered whether the inclusion of the Gatehouse and Rabans Lane industrial areas as Key Employment sites protected by policy E1 would conflict with paragraph 22 of the NPPF. This advises that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

245. The Council's response to my question 84 in respect of Gatehouse Industrial Estate refers to its Employment Land Review and its recommendations that, over time, there is potential for further rationalisation of employment uses at Gatehouse Industrial Estate to introduce a greater mix of uses. The Council also tells me that this has been addressed with retail and housing developments being permitted. This being so suggests that there is an inconsistency between, on the one hand, the Council's evidence base and its development management practice and, on the other hand the application of policy E1 to the Gatehouse Industrial Estate. In response, the Council proposes a Main Modification [**MM285**] to refine the boundary of the Gatehouse Industrial Estate shown on the policies map so as to reflect the further potential for rationalisation identified in its Employment Land Review. I agree that this modification is necessary for justification.

246. By contrast, the Employment Land Review Update identifies Rabans Lane as providing good quality industrial accommodation. It advises that policy could seek to retain the land for employment use. Its identification as a Key Employment Site is therefore justified by the supporting evidence

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

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

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

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

Housing types and sizes

249. The element of policy H6 relating to housing types and sizes is uncontroversial. It does not differentiate between housing for sale and private rented sector housing but that is unremarkable as they are not distinguishable in planning terms. It does not specify a specific dwelling mix, which would be difficult to apply with precision to the range of site sizes likely to come forward during the plan period. Rather, it requires account to be taken of the Council's most up to date evidence. That can currently be found in the amended Figure 123 of the Council's HEDNA[47] and in paragraph 5.56 of the plan. It identifies eleven categories of housing type and size which illustrates the point that a requirement in terms of precise percentages of each type could not be applied to any site other than in multiples of 100 units and still result in whole numbers of dwellings in each category. For that reason, I consider that the Council's approach to dwelling mix set out in the first part of policy H6 is sound.

Housing for older people

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

[47] Buckinghamshire HEDNA update 2016 Addendum September 2017

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

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

Accessible housing

252. In response to my Q22 the Council accepted that the final part of policy H6 required modification on the grounds that it is not possible to require a percentage of dwellings to confirm to category 3 of Building Regulations approved document M whilst at the same time requiring 100% of dwellings to comply with category 2 of the same document. If it is the case that the categories are mutually inconsistent (ie that a category 3 dwelling cannot simultaneously be a category 2 dwelling) then clearly a modification is necessary. Moreover, national Guidance[48] advises that local plan policies for wheelchair accessible (Category 3) homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, so it would be contrary to that Guidance to seek a proportion of category 3 dwellings in housing other than affordable housing to which the local authority has nomination rights.

253. It is fair to say that only a percentage of the population will need either a Category 2 or Category 3 dwelling and that requirements which apply to new build housing will do nothing to make existing housing suitable for people who have special needs. But new housing will only ever comprise a percentage of the total housing stock. To get to a position where the total housing stock

[48] Paragraph 009 Reference ID: 56-009-20150327

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

254. However, national Guidance[49] advises that the Building Regulations for Category 2 or 3 dwellings require step-free access which precludes their provision in multi-storey flatted development without lifts. Lifts are not required and may not be viable in low-rise flatted developments so national Guidance advises that in such cases, neither of the optional requirements in part M should be applied. Compliance with national policy is a soundness test and so a modification is required to exclude low rise flatted developments above the ground floor from the requirement for Category 2 housing.

255. In response to the preceding comments, the Council has comprehensively reviewed policy H6 and proposes modifications which are necessary to provide a policy which would be both effective and justified both for older persons housing and for accessible housing [**MMs 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 168, 169 and 170**].

Student housing

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

Gypsy and travellers' needs

257. The definition of gypsies and travellers changed for planning purposes in the updated Planning Policy for Traveller Sites published in 2015. There remains uncertainty how the new definition should be applied. VALP applies a cautious approach to the large proportion of people whose status is unclear and makes provision which includes them. In the absence of certainty, I consider that such a cautious approach is sound. Any consequent overprovision could provide for those who may not be defined as gypsies but who choose to follow a gypsy way of life.

258. In response to my request for observations on certain matters relating to allocation D-AGT1, the Council reminded me that VALP makes allocations for 69 pitches to meet the first ten years of need (2016-2026). This includes all the site options identified in the Aylesbury Vale Gypsy, Traveller and Travelling Showpeople Site Assessment (2016). These 69 pitches specifically include an allocation of 5 pitches on AGT1. All the allocations listed have either been implemented or are vacant pitches available for occupation, apart from the

[49] Paragraph 010 Reference ID: 56-010-20150327

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

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

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

Self-build housing

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

262. The policy would apply to allocations AGT1, AGT2, AGT3, AGT4, AGT6, AYL063, AYL115, NLV001, BUC043, BUC046, BUC051, HAD007, HAL003, WIN001and MMO006, all of which are for developments of 100 dwellings or more. One is a town centre site where conversion of an office block is expected to deliver the housing, so individual plots are unlikely to be feasible. Another, at RAF Halton is expected to involve conversion of existing heritage assets as a substantial component of delivery. The policy makes no exceptions for feasibility.

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

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

264. Representations point to the difficulties of accommodating third parties on a developer's building site and suggest that sites should be exclusively and specifically allocated for self-build housing. There is reportedly a specific allocation of a site within the Buckingham Neighbourhood Plan for self-build housing. However, in support of the effectiveness of its policy the Council reports that intending developers of allocation AGT3 are committed to the provision of 165 plots out of a total of around 1660 expected from the allocation.

265. I note that the Council substitutes the word feasibility for the word viability as a non-material modification. I conclude that the evidence indicates that this policy is sound. The plan would therefore be effective in meeting the needs of custom and self-builders.

Affordable housing

266. National Guidance advises that the types of households to be considered in housing need include those in insecure tenure because their housing is too expensive compared to disposable income. By contrast, the evidence base which underpins VALP excludes from the definition of those needing affordable housing those households which are in the private rented sector but in receipt of housing benefit,[50] notwithstanding a recognition[51] that housing benefit data from the Department of Work and Pensions provides reliable, consistent and detailed information about the number of families that are unable to afford their housing costs. The Council's evidence base does this because it regards housing benefit as an income supplement which can be relied upon in the long term[52] to allow households to afford to house themselves without recourse to affordable housing. Although this does not strictly comply with guidance as a way of defining the need for affordable housing, it represents a pragmatic appraisal of what happens in reality and so I do not regard it as unsound.

267. There are some other anomalies in the way the evidence base calculates the affordable housing need in respect of how tenants of substandard and overcrowded housing are counted. However, such anomalies are small and do not affect the overall robustness of the calculations.

268. In any event, the potential for providing affordable housing is limited by viability concerns to not much more than the figure of 4,200 dwellings identified through the needs analysis. The latter identifies a need for 24.2% of

[50] Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 paragraphs 4.104-107
[51] Ibid paragraph 4.39
[52] Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 Addendum September 2017 paragraph 3.9

all housing in both the South Buckinghamshire HMA and Aylesbury Vale District to be affordable[53]. The former estimates that suitable parameters for an affordable housing target proportion are 20-30% and that a 25% target is realistic.[54] There is no convincing evidence before me which demonstrates that this would be unsound. Other than the deletion of references to the concept of Starter Homes, which has not been taken forward [**MM112**], no other modification to the section of the plan relating to affordable housing is necessary than those [**MMs 114, 115 and116**] made in support of other issues identified in this examination to make sure that policy is stated within policy H1 rather than in supporting text and to eliminate a provision apparently applying an unauthorised charge to an applicant.

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

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

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

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

[53] Ibid paragraph 4.98
[54] VALP viability assessment August 2017 paragraphs 3.2.11-12

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

Issue 6 – The relationship with Neighbourhood Plans

273. VALP has a relationship with an exceptionally large number of Neighbourhood Plans. Paragraph 3.69 of the plan records that at the time of its drafting there were 11 "made" Neighbourhood Plans and a further 21 Neighbourhood Plan areas approved[55]. Representations relating to these relationships show considerable concerns and confusion about how the relationship will work in practice where both a made Neighbourhood Plan and VALP once adopted have policies covering the same subject (e.g design standards, parking requirements, affordable housing, changes of use in employment areas or shopping parades etc).

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

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

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

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

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

277. Since Neighbourhood Plans are meant to be in general conformity with the adopted local plan, conflicts of new Neighbourhood Plans with VALP once adopted ought not to arise. Unintended conflicts between previously made Neighbourhood Plans and VALP would be resolved through the operation of section 38(5) of the Planning and Compulsory Purchase Act 2004. If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan. As there is this statutory provision regulating the relationship between VALP and Neighbourhood Plans there is no necessity for any modification to make VALP sound except insofar as the previously mentioned modification to paragraph 3.72 is necessary for clarity and effectiveness.

278. It is easy to construct a conflict where none exists. For example, representations considered that VALP policy H1 which includes an affordable housing figure of 25% would be in conflict with Neighbourhood Plan policies requiring a higher percentage. But in fact VALP policy H1 requires "a minimum" of 25% affordable homes and so is not in conflict with Neighbourhood Plan policies which require a higher percentage.

279. If it had been the Council's intention that the more recent policies of VALP should not prevail where there is true conflict with previously made Neighbourhood Plans, then the Council would have needed to promote Modifications to policies such as H1, H6, E2, E6, T5, BE2, BE3, BE4 (and possibly others) to include words such as "Except where there is contrary policy provision in a previously made Neighbourhood Plan", so as to provide the clarity which is necessary for soundness. The council did consult on a modification to do so for affordable housing in policy H1 but, for the reasons explained in the previous paragraph, there is actually no conflict to resolve and so I do not recommend the adoption of this modification.

280. Insofar as I find VALP's policies soundly justified by the evidence, there is not the evidence before me to show that there is reason in any other case to require sound policies of the VALP to cede precedence to policies in earlier made Neighbourhood Plans which are not before me to test for soundness and which have been made in compliance with a different set of examination criteria. Accordingly, I do not require any such generally applicable modifications to be made. Other sections of my report consider individual policies on their own merits.

281. VALP sets targets for housing, retailing and employment land in policy S2, as well as making allocations in allocations policies and for housing in tables 1 and 2, for gypsies and travellers in policy S6 and tables 4 and 6, for employment in policy D5 and for retail in policy D6. Some see this approach as emasculating the role for future Neighbourhood Plans or reviews because there is no need to make further allocations in the plan period to meet the needs identified by VALP.

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

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

Issue 7 – Whether monitoring arrangements would be effective.

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

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

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

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

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

288. Representations to these modifications seeking to reinstate a commitment to an early review are largely based on changes to plan making subsequently introduced but NPPF2019 has specific transitional arrangements for previously prepared plans to continue. The passage of time inevitably brings new considerations but regulation 10A of the Town and Country Planning (Local Planning)(England) Regulations 2012 sets a standard period for review. The representations do not adduce new emerging changes in circumstances not considered previously.

289. It is, nevertheless, good practice that a plan be regularly monitored and reviewed. National Guidance advises that local planning authorities must publish, at least annually, information that shows how the implementation of policies in the plan is progressing. Policy S9 states that this will be done and so complies to that extent with national policy. National Guidance also advises that the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating and that most Local Plans are likely to require updating in whole or in part at least every five years. Policy S9 states that this will be done and so complies to that extent with national policy.

290. There is not normally any redress if a local planning authority fails to review or update a plan when necessary but policy S9 sets out four circumstances in which proposals for alternative sustainable sites will be favourably considered in any event. It is necessary to make it clear that it is progress on housing supply in general, not just on allocations which may trigger this provision. Subject to an adjustment to achieve that clarity [**MM26**], suggested by the Council, which I endorse, I consider that this policy is soundly conceived and would be effective in ensuring that a plan rendered out of date by unexpected events would not be a bar to appropriate development taking place.

Issue 8 – Whether transport policies and proposals are justified.

291. At first glance, VALP has just seven policies concerned with transport and no proposals. Two of these policies, T2 and T3, are safeguarding policies. One, T4, requires developments to mitigate their own transport effects. Two others, T5 and T7, set standards for parking and electric vehicle charging points. Elsewhere in my report I note that it is unsound for these to be delegated to SPD, as these policies do. One further policy protects footpath and cycle routes (with considerable overlap with policy C4).

292. But, on closer inspection, policies T1 and T6(a) require developments to implement the proposals in the Buckinghamshire Local Transport Plan 4, the Aylesbury Transport Strategy, the Buckingham Transport Strategy and any county-wide or local cycle strategy. Yet, none of these proposals are specified in the plan. Nor have they been subject to the public consultation procedures

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

293. NPPF (2012) paragraph 7 is quite clear that it is the role of the planning system, amongst other things, to identify and coordinate development requirements, including the provision of infrastructure. National Guidance advises that the Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.[56] It points out the need to identify the short, medium and long-term transport proposals across all modes as a key issue in developing the transport evidence base to support the local plan.[57]

294. It advises that the Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.[58] VALP does not do this and so is unsound as submitted.

295. In a number of instances, individual allocations provide an insight into what is proposed in these various external transport plans and strategies. Allocations AGT1, AGT2, AGT3, AGT4, AGT6 all refer to the provision of various link roads around Aylesbury, NLV001 requires various highway improvements and reservations connected with Milton Keynes and during a hearing session it became apparent that BUC051 is dependent on a road proposal contained within the Buckingham Transport Strategy but nowhere mentioned in VALP. It is not clear whether there would be other proposals, included in the various transport strategies but not shown in VALP, to which developments would need to comply or implement in accordance with policies T1, T2 and T3.

296. In response to the comments in the preceding paragraph and at my request, the Council proposes modifications, which I recommend for adoption, to insert the key infrastructure requirements upon which the delivery of VALP depends and to delete the BUC051 proposal which would have been dependent on the construction of a Buckingham Western Relief Road which the scale of development would have been insufficient to fund. These modifications are necessary to the soundness of the plan [**MMs 83, 202, 203, 204, 205, 206,207, 208, 209 and 210**] to show that it has been positively prepared.

297. National Guidance calls for the preparation of a transport assessment at a number of stages in the preparation of a local plan, the first being as part of the initial evidence base in terms of issues and opportunities.[59] This stage seems to have been omitted from the process of preparing VALP which seems

[56] Paragraph: 002 Reference ID: 12-002-20140306
[57] Paragraph: 003 Reference ID: 54-003-20141010
[58] Paragraph: 018 Reference ID: 12-018-20140306
[59] Guidance Paragraph: 004 Reference ID: 54-004-20141010

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

298. The second modelling report (March 2017) examines the same three development scenarios (refined to reflect changes in the component development schemes through the passage of time) but with the addition of various transport mitigations. These transport mitigation projects derive from long shopping lists of projects sought by Buckinghamshire Districts and the County Council. The selection has been made with a view to mitigating the impacts identified by the 2016 report but it is not clear that the schemes were originally conceived with that purpose in mind. In consequence, the nature of the issues or problems which the transport schemes are seeking to address is hidden. Again, the model outputs show whether there has been betterment or detriment to the highway network in terms of congestion and travel time.

299. A third modelling report (August 2017) tested the chosen development scenario of the submitted plan against two mitigation packages. Amongst other differences, one (run2) included north-eastern, western and south-western link roads around Aylesbury, the other (run1) excluded them. Run 2 also included proposals from the Buckingham Transport Strategy, whereas run 1 excluded them. Again the model outputs show whether there has been betterment or detriment to the highway network in terms of congestion and travel time. Neither run1 nor run2 reflect precisely the transport proposals which are implicit within VALP as subsequently submitted but there is no reason why they should; they simply exist to inform the selection of proposals, not to prescribe them.

300. The models are criticised for not being WebTAG (Web-based Transport Analysis Guidance) compliant but national Guidance[60] advises that for most Local Plan assessments the full methodology recommended by WebTAG will not be appropriate. Although the model is not well calibrated[61], I am satisfied that the approach chosen fulfils the requirements of Guidance by enabling a comparative analysis of the transport effects of the proposed allocations in the context of two alternative scenarios – "with development" and "without development". Overall, it appraises a greater quantity of development than actually proposed in VALP, more akin to that which will result from my recommendations and so is a robust evaluation of the transport effects of the quantity of development proposed.

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

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

301. In contrast to the Jacobs modelling, the Aylesbury Transport Strategy commissioned from AECOM and published in January 2017 asserts that it is intended to address current issues on the transport network. It does start with the transport assessment envisaged by National Guidance. It identifies six objectives, including improving transport connectivity and accessibility within Aylesbury Town and to other urban areas outside Aylesbury, improving air quality, journey time reliability and safety and making public transport more attractive. Its SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis identifies sixteen issues. The Strategy compiles a list of transport improvements to address these issues and applies the outputs of the Jacobs modelling, insofar as appropriate to the suggestions listed, before concluding that overall the result indicates how the proposed new link roads around Aylesbury can help to alleviate traffic on the existing inner roads, providing space for infrastructure to support alternative modes on those roads. The Buckingham Transport Strategy also commissioned from AECOM and published in January 2017 follows a similar pattern of review, analysis and plan.

302. VALP itself explains (in paragraph 1.17) that the main focus for road improvements will be in relation to Aylesbury, to improve the circulation of traffic around the town. The link roads can be recognised in pursuit of this objective. The paragraph also explains that there will also need to be a focus on improving north/south connectivity to enable the district to function better in relation to national highway networks and rail networks but there is no identifiable highway proposal in pursuit of this objective. Paragraph 7.2 of the plan explains that the creation of a new highway network will allow for more pedestrian and cycle friendly town centres in Buckingham and Aylesbury.

303. In response to my Q88 the Council provided a comprehensive list of all the highway link roads around Aylesbury, described their delivery mechanisms and confirmed that, in relation to Aylesbury, the reasons for the various highway road links were to deal with high volumes of through traffic in the town centre[62], congestion along radial routes, high volumes of HGVs particularly affecting Air Quality Management Areas and to provide an opportunity for the reallocation of town centre space to pedestrians, cyclists and bus priorities. My conclusions are that, although the justification for the proposals has been arrived at somewhat late in the day, and perhaps through a process of post-rationalisation, nevertheless, the evidence shows that in general, although unlikely to solve all of Aylesbury's problems, the schemes are justified and so, sound.

304. I have noted above that none of the schemes are shown on the submission policies map and only some are referred to within the body of text referring to allocation sites, never as proposals in their own right and that this is unsound because it would conflict with both NPPF policy and national planning Guidance on the role and purpose of a Local Plan and therefore requires modification. In

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

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

305. VALP shows no alignment for this link road; the requirement in the allocation is for a Strategic Link Road connecting with the ELR(N) and the A41 Aston Clinton Road. Yet, within the evidence base, several possible alignments of this road are shown. That on figure 2 of the Cumulative Growth Impact Final Report by AECOM (June 2017) shows a line swinging sharply to the east immediately south of crossing the Grand Union Canal, whereas that on figures 17, 22 and 24 of the same document shows a much more southerly alignment superimposed over a much more gently curved alignment which I believe represents the developer's proposal for the site and which appears to be reflected in the alignment shown on figure 21.

306. Figure 5-F of the Jacobs Countywide modelling of March 2017 seems to have adopted the developer's alignment as do figures 5-E and 5-F of the August local plan modelling report and the plan submitted in response to my Q88. By contrast, figures 6.3, 6.21 and 6.23 of the AECOM Aylesbury Transport Strategy of January 2017 matches the alignment shown in the majority of cases in their June 2017 Cumulative Growth report. But, on the other hand, figures 6.5, 6.7, 6.8, 6.9, 6.10, 6.11, 6.12 and 6.13 of their January report match the alignment shown on the Jacobs reports.

307. I take no view on whether VALP should show a diagrammatic or a precise alignment for this, or any other link road; planning is not precision engineering. But Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a local plan during its preparation and s39 of the same act requires that the local planning authority must do so with the objective of contributing to the objective of sustainable development. NPPF paragraph 152 advises that significant impacts on any of the dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. NPPF paragraph 182 advises that to be justified a plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 including the selection and evaluation of reasonable alternatives but do not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.

308. Representations argued that one of the three alignments of the link road on allocation AGT3 was the most appropriate because it had least effect on the functional flood plain. It is not for me to carry out a Sustainability Appraisal in the first instance; that is for the Council. But I observe that the route favoured by that representation, whilst minimising the length of road passing through the flood plain would also have the consequential effect of reducing the extent of land not in the flood plain available for housing and so the choice of the most appropriate strategy is not necessarily straightforward.

309. The Council put forward modifications to the plan to show alignments for the various link roads around Aylesbury. It carried out a further Sustainability Appraisal consequent on the modifications to the plan which it has put forward. It advises that where specific alignments are shown for transport proposals, the proposed alignment and reasonable alternatives to it have been subject to sustainability appraisal, except where these are already approved as part of a planning permission. Such is the case for D-AGT6 Kingsbrook.

310. Following the publication of these modifications, which made clear in the plan for the first time the nature of its transport proposals, and in consideration of representations made, the Council proposed further modifications. These omitted two of the link roads around Aylesbury (the North East Link Road (NELR) and the Western Link Road (WLR)) [**MMs 210, 285 and 286**]. The omissions attracted further representations. I held a further hearing session to explore the representations made. This did not lead me to any general conclusion other than those already reported above.

311. I accept the omission of the two link roads on the grounds that they have no supporting development to support their funding and there is no business case to support their inclusion in the plan and so, they would be undeliverable. A further run of the county-wide transport model shows that their omission would not worsen current congestion levels and so, their inclusion in the plan is not necessary for it to be found sound. Their omission is justified but the inclusion of the other link roads remains justified.

312. Despite any theoretical shortcomings in the methods used to generate the transport proposals, they have been pragmatically tested by modelling which is adequate for the purpose of a local plan examination. The proposals are shown to result in a situation that would be better than one without the proposals and so, they would be justified and are therefore, sound.

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

313. The government attaches great importance to the design of the built environment. It is a key aspect of sustainable development. It is not just about appearances, although visual appearance and the architecture of individual buildings are very important factors; it is about ensuring that developments function well, optimise the potential of a site to accommodate development and create safe and accessible environments.

314. VALP contains a plethora of policies which touch upon one or more aspects of design. As well as the obvious ones such as H6 (Housing mix), H7 (Dwelling sizes), T5 (Vehicle Parking), T7 (Electric Vehicle Infrastructure), BE2 (Design of new development), BE3 (protection of residents' amenity), BE4 (Density of new development), NE2 (Biodiversity and geodiversity), NE5 (Landscape character), NE6 (Pollution, air quality and contaminated land), NE9 (Trees, hedgerows and woodlands), C1 (Conversion of rural buildings), C3 (Renewable energy). I1 (Green infrastructure), I2 (Sports and recreation) and I4 (Flooding), each allocation policy includes a section headed "site criteria" which frequently specify design requirements, as does the overarching policy D1 for the delivery of Aylesbury Garden Town.

315. A common feature of many (not all) of these policies is that they are vague, unclear or rely excessively on supplementary planning documents (SPD) for their meaning or effect, in some cases requiring adherence to a supplementary planning document, many of which have yet to be prepared. National Guidance is clear that supplementary planning documents should build upon and provide more detailed advice or guidance on the policies in the plan but they should not themselves introduce new policy requirements which have not been the subject of examination. A Local Plan cannot require proposals to comply with a document which is not itself a Local Plan.

316. The test which I apply is one of effectiveness; if a policy is sufficient of itself to inform a developer or a local authority's development manager that a proposal ought or ought not to be given planning permission, then it is effective and has been soundly prepared. But if it is necessary, having read the policy, still to refer to another document, such as SPD, to reach that conclusion, then it follows that the policy is not effective and has not been soundly prepared. Too many of the design policies in VALP fall into this latter category.

317. I am relatively content with the level of specificity contained within policies H1 (Affordable Housing), NE2 (Biodiversity and geodiversity), NE5 (Landscape character), NE6 (Pollution, air quality and contaminated land), NE9 (Trees, hedgerows and woodlands), C1 (conversion of rural buildings), C3 (renewable energy) and I4 (flooding). However, in addition to the suggested changes to supplementary planning document references set out in Examination Document 129, policies D1 (Aylesbury Garden Town), H6 (Housing Mix), T5 (vehicle parking), T7 (Electric Vehicle Infrastructure), BE2 (Design of New Development), BE3 (protection of residents' amenity) BE4 (Density of new development), I1(Green Infrastructure), I2 (sports and recreation) and many of the site allocation policies require Modifications [**MMs 5, 26A, 27A, 28, 31, 32, 33, 34, 35, 39, 41, 45, 46, 48, 52, 55, 57, 61, 65, 75, 88, 115, 152, 159, 170, 213, 214, 216, 217, 220, 221, 222, 223, 224, 246, 254, 255, 257, 260, 261, 262, 268, 270, 278, 279, 280 and 281**],which identify those elements of their related SPDs which set policy requirements or standards and which therefore need to be brought into the plan itself to make it effective. Supporting text also needs to be revised to match.

318. In consequence of these changes, a number of SPDs become unnecessary because their provisions (or proposed provisions) would now form part of the plan itself. It was reported during the examination Hearing sessions that 23 SPDs are referenced within VALP. This number would reduce to 8 as a consequence of the modifications. A modification to the list of intended SPDs is necessary to reflect his reduction in their numbers. [**MM281 and appendix E**].

319. One design policy (H7 Dwelling sizes), (which seeks to require new dwellings and extensions to dwellings to provide sufficient internal space for normal residential activities commensurate in size with the expected occupancy of the dwelling) has no justification, as the Council frankly acknowledges in its response to my Question 112. Moreover, it is contrary to government policy set out in a Written Ministerial Statement dated 25 March 2015 which advises that from the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities should not set in their Local Plans or supplementary planning documents any additional local technical standards or requirements

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

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

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

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

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

323. Existing employment provision in twelve key employment sites (including the three Enterprise Zones but not including the employment sites which would result from the development allocations) is identified for protection through policy E1. The release of other employment sites for non-employment use[63] would normally be permitted by policy E2 where there had been suitable marketing for an employment re-use for two years without takers, where development would not prejudice the efficient and effective use of the

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

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

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

325. It justifies this overprovision with seven arguments;

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

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

Conflicting evidence

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

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

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

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

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

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

The FEMA

331. One is the concept that oversupply in Aylesbury Vale will help to make up shortfalls arising elsewhere within the FEMA[64]. I asked for evidence of whether the shortage of available employment land and premises in the south of Buckinghamshire was long-standing because, if it had been and there was no evidence of take-up being displaced to Aylesbury Vale, that would tend to show that this reason being advanced in favour of the Council's policies was unsound. Evidence in the form of CoStar data over ten years was submitted by Turley on behalf of SEGRO plc, for which I am grateful.

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

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

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

333. I agree that the data available is not conclusive and may simply indicate a general sign of growing confidence in the market amongst warehouse related businesses but it is not inconsistent with the theory that shortages of employment land in Wycombe and other parts of the southern sub-FEMA will result in (perhaps sub-optimal) displacement of demand to Aylesbury Vale, thus helping to justify the continued provision and retention of an overprovision there.

334. Even if representations made to the submitted Wycombe Local Plan had succeeded in persuading the examiner of that plan to require the Council to identify more land for employment uses in that plan, that would not render unsound the policies in VALP because they do not depend on that justification alone but also on other reasons to which I now turn.

The need for mixed use development

335. The need for mixed use development to provide local employment responds to the ninth and eleventh bullet points of paragraph 17 of the NPPF[65]. This establishes that one of the government's core planning principles is to promote mixed use developments. Another is to manage patterns of growth actively to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. This last is elaborated in paragraphs 37 and 38 of the NPPF which advises that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

336. Consistency with government policy is one of the criteria by which a plan is found sound. Insofar as allocations such as AGT5 (Berryfields) require mixed use development in accord with this aspect of government policy, it cannot be found unsound even though it may contribute to an oversupply of employment land. These allocations are not designated as key employment sites within the plan and so the permissive policy E2 would apply to proposals for their release for non-employment uses, not the protective policy E1.

Enterprise Zones

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

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

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

CaMKOx

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

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

Conclusion

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

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

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

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

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

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

344. The third bullet point of NPPF paragraph 23 advises that in drawing up Local Plans, local planning authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres and set policies that make clear which uses will be permitted in such locations. Compared with the adopted Aylesbury Vale District Local Plan 2004, VALP proposes to define a much larger town centre for Aylesbury, a marginally adjusted Primary Shopping Area and no changes to the primary shopping frontage.

345. The town centre boundary in the adopted local plan aligned with the A41 and A418 roads which circumscribe the core of the town. The proposed new boundary includes areas lying outside that ring of roads to include the railway station, retail parks originally constructed as "edge of centre" developments, the town's Aqua Vale Swimming and Fitness Centre and Vale Park, the town's new Waterside Theatre and adjoining hotel, a campus of Buckingham College, recently constructed office buildings and high intensity residential developments.

346. The NPPF advises, in its Glossary, that the town centre is an area defined on the local authority's proposals map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. Town centre uses are described in the fifth bullet of NPPF paragraph 23 as including retail, leisure, commercial, office, tourism, cultural, community and residential development.

347. From this definition it can be seen that the uses encompassed within the newly defined town centre boundary are town centre uses. If not all adjacent to the primary shopping area, they are at least, with the exception of the Buckingham College campus, in close proximity to it. There is little immediately outside the new boundary which could be described as an obvious town centre use and so I conclude that the new town centre boundary is justified and therefore, sound. There is, however, no definition of a Defined Town Centre in the Plan's glossary and so a modification is necessary to provide one [**MM283**] for the sake of effectiveness.

348. Despite identifying on the Central Aylesbury Inset Map a site for a mixed use town centre development which policy D7 describes as based principally on retail uses with an element of residential and other town centre uses at an appropriate scale and location, only a part of it (coinciding with the primary shopping area definition of the 2004 plan) is defined as within the primary shopping area. Although primary and secondary shopping frontages within that development site obviously cannot be defined until a scheme is designed and built, it is inconsistent, and therefore unsound, for the plan to propose a development within the town centre principally for retail uses (quantified in policy D6) yet not adjust the primary shopping area boundary to encompass it. A modification is therefore required [**MM286**].

349. Between them, policies D6, D7 and D8 govern proposals for new retail development within Aylesbury Town Centre. Policy E6 governs new uses within primary and secondary frontages. There does not appear to be any specific policy governing new uses (implying loss of retail) outside the primary or secondary frontages yet within the primary shopping area other than (possibly) the second paragraph of policy D6. Although such a policy could only apply to a very limited number of premises (on the south-west side of Temple Street and the north-west side of Bourbon Street) this is a theoretical lacuna within the plan, and so I find that its absence should be rectified by Modification [**MM188**] so as to provide effectiveness against all possibilities.

350. The Council accepts that commitment site AYL058 is incorrectly shown on the Aylesbury Inset Map and proposes modification **MM286**. In response to Natural England comments it proposes modifications **MM110 and MM111** to policies D7 and D8 to secure compliance with paragraph 114 of the NPPF. These are necessary to comply with government policy. The Council has explained that the apparent discrepancies between statements concerning proposed upgrading of the existing bus station and its replacement in a transport hub relate to short term and long-term aspirations so there is no indication of unsoundness which requires a modification to the plan.

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

351. As submitted, the policy states that a sequential test will be applied to all main town centre uses. It then goes on to state a set of criteria applicable to retailing proposals alone. One of these (criterion b) duplicates the sequential test and so is unnecessary. Two others seek to introduce the types of goods sold as a criterion of acceptability whereas it is the scale of the proposal relative to the scale of the impacted town centre which ought to be the consideration. Two others set process requirements for the submission of applications rather than conditions which a completed development must meet. These include a threshold for impact assessment which is much lower than the default set in NPPF paragraph 26 and justified less by a consideration of the size of the town centres likely to be impacted and more by a consideration of the size of proposal frequently received in the District.

352. The Council has submitted two suggested modifications [**MMs 183 and 185**] to the plan to meet these criticisms. They would refine the sequential test and apply it only to defined town centres. The threshold for impact assessment would still be lower than the national default but is justified by up to date evidence and would be related to the scale of the impacted town centre. The types of goods sold would no longer figure as a criterion. These modifications are necessary to justify the policy and to make it effective.

353. The aim of this policy, to direct town centre uses to town centres, is reinforced by clause (c) of policy E1 but that lacks clarity. A modification [**MM176**] is necessary to make it clear that the policy to protect key employment sites from the incursion of town centre uses does not apply to those town centre uses in Use Classes E, B2 or B8 which properly belong in key employment sites and enterprise zones.

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

354. In respect of a robust and up to date assessment of open space needs, reference is made in policy I1 which requires the provision of new green infrastructure by reference to the Council's assessment of Open Space, Sports and Recreation Needs for Aylesbury Vale (2017). But a similar reference is lacking from policy I2 which requires sport and recreation provision in new development and from policy I3 which requires the provision of new community facilities. Modifications are therefore required.

355. The Council has responded with a comprehensive review of the open space provisions of chapter 11 of the Plan. Following representations about the definition of green infrastructure in the proposed modifications, the Council adjusted their wording. I agree that the modifications proposed, adjusted where appropriate in line with the Council's suggestions [**MMs 29, 30, 246, 247, 248, 249, 254, 255, 256, 257, 260, 261, 262, 268, 269, 270, 271, 279, and 280**] are necessary for soundness and so, recommend that they be included in the plan for adoption.

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

356. VALP contains two policies concerned with the protection of fauna, flora, geological and physiographical features. One (NE1) is concerned only with protected sites. SSSIs and ancient woodlands are specifically mentioned in the policy itself but supporting text refers also to local geological sites of regional significance and local nature reserves. The other policy (NE2) is concerned with biodiversity and geodiversity in general but it contains specific sections applying only to internationally designated Special Areas of Conservation (not specifically referenced in policy NE1) and to SSSIs.

357. There is duplication and overlap which is unclear and therefore unlikely to be effective and so, not sound. The two policies and their supporting text should be merged into a single policy [**MMs 224, 228 and 232**], eliminating the distinction between greenfield and brownfield sites in criteria (a) and (i) of NE2 which, at the hearing sessions, the Council accepted was an unnecessary distinction and including the acceptance of mitigation within criterion (g) of NE2. These modifications have been refined in response to representations made. Supplementary modifications [**MMs 235 and 236**] to policies NE8 and NE9 to require agricultural land classification assessments and protection for Ancient Woodland are also necessary to make the Plan clear and effective.

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

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

359. VALP puts this advice into practice in relation to landscape by recognising at the highest level in the hierarchy the Chilterns AONB designated as a

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

360. Lower down the hierarchy are two local designations recognised by VALP. Of the two, Areas of Attractive Landscape (AALs) are said to have the greater significance in the hierarchy, Local Landscape Areas (LLAs) the lesser. Policy NE5 sets a criteria based policy applicable to both local designations and also to the remaining undesignated landscape of the District. It requires all development proposals to have regard to the Council's Landscape Character Assessment (LCA) of 2008 (amended 2015). The additional criteria applicable to the two local designations are that proposed development therein should have particular regard to their character defined in a more recent (2016) report. This seems no more than is commensurate with their locally designated status. Mitigation of harm would be sought in both designated and undesignated landscapes.

361. The two major criticisms of the justification of policy NE5 are that it is based on an evidence base now over ten years old, applying the methodology of its time, and that, in places, the landscape has changed, invalidating its findings. It is true that both national policy and landscape assessment methodology have changed over time but essentially, the evidence base recognises this. It is therefore, not invalid. NPPF advice emphasises criteria-based policies. Policy NE5 is such a policy, applying seven criteria with reference to the 2008 Landscape Character Assessment and to the 2016 report *Defining the Special Qualities of Local Landscape Designations in Aylesbury Vale District*.

362. Although the local landscape designations predate current national landscape policy and advice, that 2016 report has evaluated their designations with reference to current best practice, finds that although the evidence for why their boundaries were drawn as they are is no longer available, they nevertheless show continuity with the Landscape Character types and Landscape Character Areas defined in the 2008 study which shows a reasoned justification for their continuation. It finds that four areas are not justified by reference to current thinking and these are not included in the submitted VALP. It provides the additional work to identify key valued features and characteristics of each designated area which the 2015 advice felt was necessary to bring the 2008 study in line with current best practice.

363. I therefore conclude that the approach taken to landscape protection policy within VALP is sound in its general approach. It needs no modification other than those proposed by the Council to amend the supporting text and footnotes 7 and 9 to policy S3 [**MMs 13, 14, 233 and 234**]. These would;

- define the term coalescence more clearly
- add a sentence to policy NE4 so as to require a LVIA for development likely to impact the AONB
- amend policy NE5 to delete specific reference to the 2008 Landscape Character Assessment and
- amend its penultimate sentence to recognise that mitigation of effects should be taken into account

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

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

364. NPPF paragraph 126 advises that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. As submitted, VALP appears to contain only one policy (BE1) relating to heritage assets. It is generic, rather than specific to any heritage asset and it is reactive, rather than proactive.

365. These specific concerns are assuaged by modifications **MM218** and **MM219**, which are necessary to demonstrate compliance with government policy. The former modification makes it clear that paragraphs 8.1 to 8.39 of the plan represent the plan's response to the NPPF requirement that local plans should contain a positive strategy for the conservation and enjoyment of the historic environment. The latter makes the point that the positive application of the strategy to particular heritage assets is contained within the allocation policy relevant to the particular heritage asset in question. This can be seen within allocations D-CDN001 and D-AYL059 amongst others. **MM220** to policy BE1 itself is also necessary to bring the policy into line with the NPPF.

366. My comments on allocations D-AGT2, D-HAD007 and D-HAL003 (RAF Halton) are also germane to this issue. They demonstrate how the Council's evidence base has taken into account heritage matters in preparing the proposals for individual allocations.

Issue 16 - The passage of time

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

Assessment of Other Aspects of Legal Compliance

368. My examination of the legal compliance of the Plan is summarised below.

369. The Local Plan has been prepared in accordance with the Council's Local Development Scheme.

370. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.

371. Sustainability Appraisal has been carried out and is adequate. Appraised options at the plan submission stage did not include dispersed settlement

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

372. A number of representations allege that individual sites have been incorrectly evaluated in the Sustainability Appraisal. The implication is that, if their scoring were different then a different selection of sites would be included in the chosen development strategy. The scoring system used in the SA is a matter of judgement. Although I might come to a different judgement in a particular instance, as do some of the representations made, it does not follow that the judgement made in the SA is thereby unsound; it is simply different. I have not identified any circumstance in which I could clearly say that an unsound judgement has been made in the process which was clearly trying to constrain an excessive number of suitable sites to the housing numbers identified through the HEDNA.

373. Moreover, the representations misunderstand the purposes of the Sustainability Assessment; as noted earlier, in the discussion on allocation HAL003 RAF Halton, it is to inform the determination of a preferred strategy for VALP but it does not itself determine the preferred strategy. As the final sentence in Appendix III of the Sustainability Assessment makes clear, the intention is for the Council and stakeholders to take its findings into account when considering how best to 'trade-off' between competing objectives and establish the 'most sustainable' option. The way in which the Council has made that "trade-off" is clearly stated in paragraph 8.2.2 of the Sustainability Assessment. It does not depend on the score of any one site but on the characteristics of the options overall. A different ranking of the options in respect of any given criterion would not necessarily lead to a different choice being made. Paragraph 8.2.3 of the SA correctly points out that the chosen option also reflects the findings from other evidence documents; it does not just reflect the SA itself or feedback from public consultation.

374. Nevertheless, it should be clear from the sections of this report which deal with the spatial development strategy and the housing land allocations that an adjustment to the choice of spatial strategy needs to be made in order to identify additional allocations for housing development. A further option has needed to be considered. That further choice has been informed by an updated Sustainability Assessment which has also considered all the proposed modifications to the Plan, albeit scoping out some at an early stage of the Assessment.

375. The Habitats Regulations Appraisal Report (April2017) is based on a main report evaluating an earlier version of the plan, supplemented by an Assessment report dated August 2017 which evaluates three main policy changes to conclude that the original Appraisal continues to hold true for the submission plan. However, paragraph 5.21 of the original Appraisal report

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

376. Paragraphs 5.22 and 5.23 of the Appraisal Report conclude that the plan contains sufficient mitigation to avoid likely significant effect on the Chiltern Beechwoods SAC because policies NE1, NE2 and I1 "specifically outlines the amount of and distance to sufficient green space and thus has the potential to offset recreational impacts". That conclusion is reiterated in paragraph 6.2 of the original Appraisal report. However, policy I1 in the submitted plan drops the prescription for the provision of natural green spaces which was in the earlier version of the plan. I am therefore unable to confirm that the plan as submitted would avoid significant effect on the Chiltern Beechwoods SAC and consequently, the plan as submitted must be found unsound in that respect. Modifications **MM260** and **MM279** are therefore necessary to reinstate requirements for the provision of accessible green space to mitigate likely significant effects on the Chiltern Beechwoods SAC.

377. Moreover, the recent judgement in the Court of Justice of the European Union (People over Wind, Peter Sweetman v Coillte Teoranta)(Case C-323/17) which is subsequent to the submission of the plan means that Appropriate Assessment cannot be avoided by the inclusion of mitigation measures within a project. Accordingly the Council commissioned a revised HRA Screening Assessment and an Appropriate Assessment, during the examination of the plan.

378. The consequent Habitats Regulations Appraisal Report prepared by LUC in June 2019 shows that whilst most likely significant effects on nearby SACs can be screened out, an AA is necessary in respect of the likely effects of recreational pressure and air pollution on parts of the Chiltern Beechwoods SAC. The report carries out those full assessments which show that in fact, no significant effect through air pollution would result but that the plan may have some negative effects through recreational impact which require mitigation but that this mitigation will have been secured through the plan as proposed to be modified.

379. As originally submitted, the local plan omitted to deal adequately with some strategic priorities such as the need to plan for the housing needs of some specialist groups but this omission has been remedied by modifications such as **MMs 153, 154, 155, 156, 157, 158, 159, 168, 169 and 170**. Consequently, I am satisfied that the Local Plan as proposed to be modified, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.

380. The Local Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Examples include policies T7 (electric vehicle infrastructure (as proposed to be modified by modification **MM217**)) C3 (renewable energy (as modified by modification **MM243**) and I4 (flooding (as proposed to be modified by modification **MM275**)) designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

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

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

Overall Conclusion and Recommendation

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

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

P. W. Clark

Inspector

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

Appendix – Main Modifications

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

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

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

Ref	Page	Policy / Paragraph	Main Modification
			existing commitments and completions totals ~~28,830~~ 30,134, which represents a ~~5.2~~ 5.4% buffer on top of the requirement to meet the district's own objectively assessed need and the unmet need from the other authorities (~~27,400~~ 28,600).
MM10	34	S2	*(a) Amend bullet points;* • A total of at least ~~27,400~~ 28,600 new homes in accordance with the spatial distribution set out below and in Table 1. ~~This is made up of:~~ • ~~19,400 homes to meet the needs of Aylesbury Vale District~~ • ~~2,250 homes to meet the needs of Wycombe District~~ • ~~5,750 homes to meet the needs of Chiltern/South Bucks Districts~~ • Provision for the identified need of at least 27 hectares of employment land and additional provision of some employment land to contribute to the employment needs of the wider economic market area. • Retail convenience floor space of at least 7,337 sqm[1] and comparison floor space of at least 29,289 sqm[2] • Associated infrastructure to support the above *And amend second sentence of second paragraph;* The strategy also allocates growth at ~~a~~ two sites adjacent to Milton Keynes which reflects its status as a strategic settlement immediately adjacent to Aylesbury Vale ~~District~~ *and (c) amend clauses (a) to (j);* a. Aylesbury Garden Town (comprising Aylesbury town and adjacent parts of surrounding parishes), will grow by ~~16,398~~ 16,207 new homes. It will be planned and developed drawing on Garden City principles which are set out in the Aylesbury Garden Town section, with high quality place-making and urban design principles at the core. This development will seek to support the revitalisation of the town centre. New housing will be delivered through existing commitments, including Berryfields and Kingsbrook, and complemented by other sustainable extensions and smaller scale development within the existing urban area. New homes to support economic growth will be accommodated through the effective use of previously developed land or sustainable greenfield urban fringe sites. These sites will provide or support delivery of identified strategic infrastructure requirements, and sustainable transport enhancements and make connections to strategic green infrastructure and the Vale's enterprise zones. b. Buckingham will accommodate growth of ~~2,359~~ 2,177 new homes. This, growth will enhance the town centre and its function as a market town, and will support sustainable

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

[2] District-wide provision

Ref	Page	Policy / Paragraph	Main Modification
			economic growth in the north of ~~the district~~ Aylesbury Vale. c. Haddenham will accommodate growth of ~~1,051~~ 1,082 new homes. This will be supported by infrastructure and recognise the important role of Haddenham and Thame railway station. d. Winslow will accommodate growth of ~~1,166~~ 870 new homes, linked with the development of East-West Rail and the new railway station in Winslow e. Wendover will accommodate around ~~1,128~~ 1,142 new homes with 1,000 new homes at Halton Camp which is now confirmed to be closing fully in 202~~2~~5 recognising the sustainability of Wendover and the railway station. No further growth is allocated at Wendover reflecting the environmental constraints of the surrounding AONB and Green Belt land. f. Land ~~within~~ in the north east of Aylesbury Vale adjacent to Milton Keynes will make provision for ~~2,212~~ 3,356 homes on a number of sites. g. At larger villages, listed in Table 2 ~~Policy S3~~, housing growth of ~~1,963~~ 2,408 will be at a scale in keeping with the local character This will help meet identified needs for investment in housing and improve the range and type of employment opportunities across ~~the district~~ Aylesbury Vale. h. At medium villages, listed in Table 2 ~~Policy S3~~, there will be housing growth of ~~1,095~~ 1,423 at a scale in keeping with the local character and setting. This growth will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area. i. At smaller villages, listed in Table 2 ~~Policy S3~~, there will be more limited housing growth coming forward through either 'windfall' applications or neighbourhood plan allocations rather than allocations in this Plan. j. Elsewhere in rural areas, housing development will be strictly limited. This is likely to be incremental infill development and should be principally in line with Policy D4 and other relevant policies in the Plan.
MM11	36	Table 1	*Delete table 1 and substitute replacement table 1 appended at end of these modifications*
MM12	38	Table 2	*Delete table 2 and substitute replacement table 2 appended at end of these modifications*
MM13	42	3.22	*Amend;* Part of the character of Aylesbury Vale is the distribution of settlements with individual identities. Settlement identity therefore needs to be protected to retain this important element in the area's character. The Council will therefore seek to ~~preserve~~ prevent the character and identities of neighbouring settlements or communities being degraded by development that would negatively affect their individual identities. To further protect the area's character the ~~Council~~

Ref	Page	Policy / Paragraph	Main Modification
			council will also resist development that would compromise the open character of the countryside between settlements, especially where the gaps between them are already small.
MM14	42	S3	*Amend;* The scale and distribution of development should accord with the settlement hierarchy set out in Table 2, ~~and~~ the site allocation policies that arise from it and the requirements of Policy S1. Other than for specific proposals which accord with policies in the plan to support thriving rural communities and ~~land~~ the development of allocations in the Plan, new development in the countryside should be avoided, especially where it would: a) compromise the character of the countryside between settlements, and b) result in a negative impact on the identities of neighbouring settlements or communities leading to their coalescence[3]. In considering applications for building in the countryside the ~~Council~~ council will have regard to maintaining the individual identity of villages and avoiding extensions to built-up areas that might lead to further coalescence between settlements.
MM15 Not used			
MM16	44	3.32	*Delete final two sentences;* ~~Whilst the arguments for releasing the RAF Halton site still remain, because of the change in circumstances and the future work to be done around how the site is developed after its closure, it is considered premature to define the boundary of the site to be released from the Green Belt. This boundary will be defined in a future Local Plan review~~
MM17	46	3.41	*Delete paragraph*
MM18	48	S5	*Amend;* All new development must provide appropriate on- and off-site infrastructure (in accordance with the Infrastructure Delivery Plan) in order to: a) avoid placing additional burden on the existing community b) avoid or mitigate adverse social, economic and environmental impacts and c) make good the loss or damage of social, economic and environmental assets. In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision. Development proposals must demonstrate that these have been taken into account when determining the

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

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

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

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			Amend table 7 annual requirement; ~~1370~~ 1430 *Amend table 7 second row, 2014/5 column;* ~~1,419~~ 1,355 *Amend table 7 second row, 2016/7 column;* ~~1,~~323 1,309 *Amend table 7 second row, 2017/8 column;* ~~1,289 (projected)~~ 1,395 *Amend table 7, third row;* ~~-380~~, -440, ~~-331~~, -515, ~~-510~~, -754, ~~-557~~, -875, ~~-638~~, -910 *Add 2018/9 column to table 7;* 1,430, 1,758, -582 *Add 2018/9 column to table 7;* 1,430, 1715, -297
MM25	58	3.80	*Amend first sentence to substitute* 1430 *for* ~~1370~~.
MM25A	59	Table 8	*Delete table 8 and substitute amended table 8 (appended at end of these modifications)*
MM25B	59	3.84	*Amend;* ~~2007~~ 2010, ~~2017~~ 2020, ~~74~~ 76, ~~are~~, ~~962~~, 760, ~~13~~ 10, ~~2020~~ 2023
MM26	59	S9	*Amend clause (a);* Site allocations, committed sites, and windfall sites are not coming forward at the rate anticipated in the housing trajectory, leading to development not being delivered at the rate expected in the Plan *And amend final sentence;* Irrespective of the above criteria, the Plan will ~~be reviewed~~ have undergone a review within five years of the adoption of this plan.
MM26A	61	4.4	*Amend;* Alongside the policy within VALP a series of accompanying planning documents (SPDs) are being developed to support delivery of the Garden Town. These SPDs ~~will focus on~~ include: • An AGT Framework and Infrastructure SPD will provide further guidance on the coordination of growth across AGT and linkages and improvements to the existing built environment and in particular the town centre. It will include an action plan and a strategic infrastructure delivery ~~of the Garden Town - this~~ schedule which will set out ~~all~~ the key strategic physical, green and social infrastructure required to deliver ~~a~~ the Garden Town ~~setting out how it is funded, when it will be delivered and how~~ • The Aylesbury Vale Design SPD will include strategic

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			Garden Town design guidance ~~for the Garden Town – this will further define the character of the Garden Town and provide design guidance for key components such as transport and movement routes, parks and green space and built development, and focus on delivery and implementation of this~~ • A site-specific Masterplan SPD~~s, as required, for the garden communities to set out a clear and detailed framework for place-making and delivery of each site~~ for D-AGT1 to ensure comprehensive development is delivered in accordance with the site requirements and Garden Town principles.
MM27	62	4.7	*Amend;* Taking forward past completions since 2013 (~~2,861~~ 5,604 dwellings) and projected supply from existing allocated sites and other deliverable sites (~~5,727~~ 7,321 dwellings), this leaves ~~7,810~~ 3,282 dwellings to be allocated at Aylesbury in the VALP.
MM27A	62	4.8	*Insert before final sentence;* Guidance on how to achieve successful garden communities will be set out in the Aylesbury Vale Design SPD.
MM28	65	4.18	*Amend penultimate sentence;* ~~Policies D2 and S4 support~~ Policy S5 supports the VALP's infrastructure delivery, alongside the AGT Framework and Infrastructure SPD.
MM29	66	4.21	*Amend;* The green infrastructure ~~proposal~~ map for this, shown below, sets out the ~~proposal~~ area and some detail about the project. More information can be found in the green infrastructure proposals schedule in the delivery plan. Policy I1 supports the delivery of multi-functional green infrastructure. In 2016 the Buckinghamshire and Milton Keynes Natural Environment Partnership, which includes AVDC and BCC, produced a 'Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes' setting out a number of principles to support the delivery of high quality green infrastructure. The document serves as a supplementary update to the 2009 GI Strategy and should be implemented as part of policy I1.
MM30	66	4.21 map title	*Amend;* Aylesbury Linear Park Green Infrastructure ~~Proposals~~ Map
MM30A	67	4.24	*Amend;* ~~16,398~~ 16,207
MM31	69	D1	*Amend second paragraph;* Aylesbury will deliver at least ~~16,586~~ 16,207 new homes. Taking account of commitments and completions, ~~7,810~~ 3,282 homes are allocated at Aylesbury in the Plan. The Policies Map allocates the following major sites for

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

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

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MM33	72	4.35	*Amend;* ~~Parts of the overall site have individual planning applications which are at varying stages.~~ The current planning status of the site is as follows: • The western parcel of SMD004 has ~~an as-yet undetermined application~~ detailed permission for 125 dwellings and is under construction (18/00913/ADP ~~16/04608/AOP). SMD018 has outline planning permission for 117 dwellings.~~ • There is an as yet undetermined application for 750 dwellings which covers the remainder of SMD004 as well as SMD006 (19/01628/AOP). 39 of the 125 permitted dwellings have now been completed and the remaining 86 are expected to be delivered by 2022. The remainder of the "South Aylesbury" site is to come forward between 2024 and 2033, as it is dependent on the delivery of infrastructure related to the development of HS2. The AGT1 Masterplan SPD will provide further guidance and information on expected time of delivery.
MM34	72	4.37	*Amend first sentence;* ~~A Master Plan~~ The AGT1 Masterplan SPD for the site will ~~establish~~ elaborate on policy D-AGT1 by advising on the site layout and disposition of land uses. *Delete the remainder of the paragraph*
MM35	74	D-AGT1	*Add new row below size (hectares);* **Completions and expected time of delivery** 39 homes delivered up to 2020, 161 homes to be delivered 2020-2025 and 800 homes to be delivered 2025-2033 *In allocated for row, delete fourth bullet point.* *Amend site-specific requirements a, c, d, g, h, i, m, o, p, and q (re-referenced as r) re-reference r as t and add new requirements q, s and u;* a. Provision of land for ~~around~~ at least 1,000 dwellings at a density that takes account of the adjacent settlement character and identity, integrates new development with the existing built area of Aylesbury and responds positively to the best characteristics of the surrounding area c. ~~Provision~~ Safeguarding the land required for the delivery of a dual carriageway distributor road (the SEALR) between B4443 Lower Road and A413 Wendover Road to cross the railway line with sufficient land for associated works including but not limited to earthworks, drainage and structures. d. Provision of new access points into the ~~sites~~ development parcels from the B4443 (Lower Road) and A413 (Wendover Road). Access from the South East Aylesbury Link Road (SEALR) will not be supported unless it can be demonstrated that this would leave parcels of land inaccessible and

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			incapable of development.. g. Proposals must retain and enhance existing habitats where practicable, including the creation of linkages with surrounding wildlife assets and green corridors linking development with the wider countryside and surrounding communities h. Provision and management of 50% green infrastructure to link to other new development areas and the wider countryside as part of a high quality built and semi-natural environment i. The development should be designed using a landscape-led approach including consideration of the long-distance views of the AONB and the field pattern and landscape features on the site m. The development should be designed using a sequential approach. Flood Zones 2 and 3, and 3a plus climate change (subject to a detailed flood risk assessment) should be preserved as green space as shown in the policies map as the area of 'not built development'.~~, with built~~ Built development should be restricted to Flood Zone 1 o. Provision of a buffer between the new development and Stoke Mandeville to maintain the setting and individual identity of the existing settlement of Stoke Mandeville p. Provision of land, buildings and car parking for a combined primary school, including playing field provision, and a contribution to secondary school provision q. Provision of land, buildings and car parking for a new local centre, including ~~community hall~~ retail r. Provision of financial contributions towards off-site ~~on-site~~ health facilities ~~and community buildings (including temporary buildings if necessary)~~ s. Provision of community buildings, including temporary buildings if necessary u. Retention of the Grade II listed Magpie Cottage within an appropriate setting *Amend Implementation approach;* Development of the South Aylesbury Strategic Site Allocation will come forward towards the latter end of the Plan period, and only once a AGT1 Masterplan SPD for the allocation has been prepared and adopted by the Council. Proposals for development within the South Aylesbury Strategic Site Allocation will be expected to demonstrate how they positively contribute to the achievement of the SPD and the Aylesbury Garden Town Principles as set out in Polic~~ies~~y D1 ~~and D2~~. Any development on this site should be in accordance with the overarching policies and principles for the development of Aylesbury Garden Town
MM36	76	4.40	*Amend;* The allocation comprises the following sites: • Land between Oxford Road, Standalls Farm and Aylesbury

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			(STO016 and SMD009) – ~~up to~~ ~~1,382~~ 1,400 dwellings (1,300 up to 2033 and then 100 after the plan period) • Land at Lower Road Aylesbury (SMD012) – already ~~committed~~ permitted for 190 dwellings ~~• Land between Marsh Lane, Princes Risborough Railway Line and Aylesbury – up to 168 dwellings.~~
MM37	76	4.42	*Amend first sentence;* The majority of the allocation is planned to come forward ~~later in the Plan period~~ between 2024 and 2033 and the delivery will be affected by the site's ~~especially due to the~~ relationship to and dependence on the delivery of HS2.
MM38	76	4.43	*Add full stop at end of first sentence. Correct reference to A4010 in sixth sentence. Delete seventh sentence.*
MM38A	76	4.45	*Amend;* At the site known as Lower Road (SMD012), ~~all 190~~ 129 dwellings have now been completed and the remaining 61 dwellings ~~will~~ are expected to be delivered ~~in years one to five of the Plan period~~ by 2022. The remainder of the 'South west Aylesbury' site ~~will commence delivery within the end of the first ten years of the Plan, with the majority delivered in 10-15 years~~ is projected to deliver between 2024 and 2033.
MM39	77	4.47	*Delete paragraph*
MM40	77	4.48 and 4.49	*Delete paragraphs*
MM41	78	D-AGT2	*Add new row below size (hectares);* **Completions and expected time of delivery** 129 homes built up to 2020, 121 homes to be delivered 2020-2025 and 1,240 homes to be delivered 2025-2033 *Amend last line of Size row;* ~~11.6ha~~ 9.36ha *Amend first bullet of Allocated for row;* ~~Around~~ At least ~~1,550~~ 1,490 dwellings up to 2033 *Amend first line of site specific requirements and clause a, re-reference clauses b, c, d, h, i, k, m, n, o and s, as c, d, e, i, j, l, n, o, p and u, insert new requirements b and t and amend clauses e, f, g, j, l, p, q and r as clauses f, g, h, k, m, q, r, s, and v;* Development proposals must be accompanied by the information required in the Council's Local Validation List and comply with all other relevant policies in the Plan, including the principles of development for Aylesbury Garden Town ~~and the Masterplan SPD to be prepared for the site~~ a. Create a new garden community providing ~~Provision for~~ land for ~~around~~ at least ~~1,550~~ 1,490 dwellings at a density that takes account of the adjacent settlement character and identity. The development should be integrated with the

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

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			~~temporary community buildings if necessary)~~ t. Provision of community buildings, including temporary buildings if necessary v. Retention of a suitable setting for Grade II listed Hall End farm house and Stoke Cottage *Amend implementation approach;* Development of the South west Aylesbury Strategic Site Allocation will come forward towards the latter end of the Plan period, and only once a Masterplan ~~and Delivery SPD~~ for the allocation has been prepared ~~and adopted by the Council~~.
MM42	80	4.51	*Amend;* The allocation comprises the following sites: • Woodlands~~÷~~, College Road North (WTV018) – ~~allocated for~~ has a resolution to grant permission subject to a Section 106 agreement for 1,100 dwellings (990 allocated up to 2033 and 110 expected to deliver after the plan period) and 102,800 sqm of employment land alongside infrastructure. This site will form a key development area of employment and custom build housing to support the growth of the Garden Town • Manor Farm~~÷~~, Broughton (BIE022) – allocated for 350 dwellings • Westonmead Farm~~÷~~, A41 London Road (WTV017) – allocated for ~~60~~ 157 dwellings • College Farm~~÷~~ (AST037)– allocated for 250 dwellings
MM43	81	4.59	*Amend;* The current planning status of the site is as follows: • The area of the site known as Woodlands (WTV018) has a current planning application, 16/01040/AOP, which has a resolution to grant permission subject to a Section 106 agreement ~~as yet undetermined~~. It proposes up to 102,800 sqm of employment land, a strategic link road connecting with the ELR (N) and the A41 Aston Clinton Road, transport infrastructure, landscape, open space, flood mitigation and drainage, and up to 1,100 dwellings (including custom and self build units), and a 60-bed care home/extra care facility. • Westonmead Farm (WTV017) has an as yet undetermined application in for 157 dwellings (17/04819/AOP).
MM44	81	4.60	*Amend;* Development of the first 990 homes of Woodlands ~~this site will commence within the first five years of the Plan period,~~ is projected to deliver between 2024 and 2033, with the final 100 delivering by 2034. ~~and~~ The 157 homes at Westonmead Farm are expected to be delivered between 2023 and 2026 and then ~~will complete by the end of the Plan period~~ the remainder of the "Aylesbury north of A41" site is expected between 2026 and 2033.

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

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

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			x. Any proposal will need to ensure a condition is applied requiring the submission of a detailed Design Code (covering built form, highways and, landscaping) ahead of any Reserved Matters applications. y. This site allocation contains 5 grade 2 listed canal structures along the Grand Union Canal to the north of the site. Along with the consideration of these structures, the setting of the list Listed Buildings adjacent to Woodlands located at Threshers Bern, Turners Meadow at Aston Clinton and Burnham's Field at Weston Turville will also need to be considered in relation to any proposals. *Amend Implementation approach row;* Development of the Aylesbury north of the A41 strategic site allocation will come forward towards the latter end of the Plan period, in accordance with the Masterplan ~~and Delivery SPD~~ for the allocation ~~that has been prepared and adopted by the Council.~~ Proposals for development within this strategic site allocation will be expected to demonstrate how they positively contribute to the achievement of ~~the SPD and~~ the Aylesbury Garden Town Principles as set out in Policy D1. *Insert concept plan for Woodlands*
MM49	86	4.67	*Amend;* The allocation comprises the following sites: ~~• the first is the major development area known as Hampden Fields which allocates 3,000 homes and 46,800 sqm of employment. This site will form a vital urban extension to Aylesbury, integral to the town's Garden Town status~~ ~~• the second site known as 'Land adjacent to Aston Clinton Holiday Inn' will deliver 60 homes~~ ~~• the third known as 'Land at New Road Weston Turville' will deliver a further 51 homes.~~ • Land at Hampden Fields (WTV022) – has a resolution to grant permission subject to a section 106 agreement for 3,000 dwellings (2,555 allocated up to 2033 and 445 expected to deliver after the plan period) and 46,800 sqm of employment. This site will form a vital urban extension to Aylesbury, integral to the town's Garden Town status • Land adjacent to Aston Clinton Holiday Inn' (WTV019) – allocated for 108 dwellings • Land at New Road, Weston Turville (WTV021) – allocated for 51 dwellings • Land east of New Road, Weston Turville (WTV020) – already permitted for 64 dwellings • Land bounded By New Road And Aston Clinton Road (WTV025) – already permitted for 135 dwellings
MM50	86	4.73	*Delete paragraph and substitute;* The current planning status of the site is as follows: • Land at Hampden Fields has a resolution to grant

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			permission subject to a Section 106 agreement reference (16/00424/AOP) • Land adjacent to Aston Clinton Holiday Inn (WTV019) , has an as yet undetermined application for 108 dwellings (16/03388/AOP) • Land east of New Road, Weston Turville (WTV020) has detailed permission and is under construction (17/00533/ADP) • Land Bounded By New Road And Aston Clinton Road (WTV025) has detailed permission and is under construction (16/01254/ADP)
MM51	86	4.74	*Delete paragraph and substitute;* Land Bounded By New Road And Aston Clinton Road and Land east of New Road were both completed at the end of 2019. Land at Hampden Fields is projected to come forward between 2023 and 2033 and the remainder of the "Aylesbury south of A41" site is expected to deliver between 2022 and 2027.
MM52	87	4.75	*Amend;* Careful consideration needs to be given to phasing and co-ordination of the delivery of the whole site ~~through the Masterplan and Delivery SPD~~.
MM53	87	4.77	*Delete paragraph*
MM54	87	4.79	*Delete paragraph*
MM55	88	D-AGT4	*Add new row below size (hectares);* **Completions and expected time of delivery** 199 homes built up to 2020, 338 homes to be delivered 2020-2025 and 2,376 homes to be delivered 2025-2033 *Amend first bullet of Allocated for (key development and land use requirements) row;* ~~Around 3,111~~ At least 2,913 dwellings *Amend Site-specific requirements first sentence and clauses a, c, e, f, m, p, re-reference q as r and insert new clauses q and s;* Development proposals must be accompanied by the information required in the Council's Local Validation List and comply with all other relevant policies in the Plan, including the principles of development for Aylesbury Garden Town ~~and the Masterplan SPD to be prepared for the site~~. a. Provision of ~~land for around~~ at least ~~3,111~~ 2,913 dwellings at a density that takes account of the adjacent settlement character and identity. The development should be integrated with the existing build area of Aylesbury, and maintain the settings, ~~and~~ individual identity and character of Stoke Mandeville and Weston Turvill b. Provision of land, building and car parking for two primary schools each with a pre-school, a children's centre on one of

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			the primary school sites and funding to support ~~upper~~ secondary school provision, ~~grammar school provision,~~ and expansion of existing special schools c. Existing vegetation and landscape features should be retained where practicable, including field patterns, existing woodlands and hedgerows. Existing public rights of way need to be retained and integrated into the development within safe and secure environments as part of a wider network of sustainable routes, to directly and appropriately link the site with surrounding communities and facilities utilising green corridors e. The development should be designed using a landscape-led approach including consideration of the long-distance views of the AONB and respond positively to the best characteristics of the surrounding area f. Provision for cycleways, footpaths and public transport connections into the town and to surrounding areas m. The development should be designed using a sequential approach. Flood Zones 2 and 3 and 3a plus climate change (subject to detailed flood risk assessment), as shown on the policies map as "areas of not built development", should be preserved as green space with built development restricted to Flood Zone 1 n. New major transport infrastructure such as ~~Eastern~~ the Southern Link Road should be designed so that the potential loss of floodplain and change of flow pathways resulting from their implementation do not have an adverse effect on flood risk. They should also be designed to ensure that they remain operational and safe for users in times of flood p. Provision of an on-site health facilit~~iesy~~ ~~and community buildings (including temporary buildings if necessary)~~. Where it is justified provision for expansion or an alternative larger site may need to be identified and secured for a multipurpose health facility to accommodate further growth and service demand to increase capacity. q. Provision of community buildings, including temporary community buildings if necessary s. Provision of employment land which is attractive to occupiers who seek an accessible, high quality location. *Insert concept plan for Hampden Fields*
MM55A	90	4.81	*Amend:* The Berryfields Major Development Area (MDA) is situated to the north-west of Aylesbury. The development includes ~~3,254~~ 3,372 new dwellings, employment, a district centre, schools, transport infrastructure and open space and community facilities. The site is situated off the A41 to the north-west of Aylesbury and includes the following permissions: • 'Berryfields MDA' (03/02386/AOP) - permitted for

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			3,000 dwellings and under construction • 'Berryfield House' (07/03447/AOP) - permitted for 235 dwellings and was completed in 2016 • 'Berryfields MDA' (17/02999/APP) - permitted for 112 dwellings and is under construction • 'Berryfield Cottage' (10/01848/APP) - permitted for 19 dwellings and under construction • 'Berryfields MDA' (17/03863/APP) - permitted for 13 dwellings. Seven of these fall under the original permission for 3,000 dwellings.
MM55B	90	4.83	*Amend;* Over ~~half~~ 85% of the housing on the site has been completed and reserved matters have been granted for the remainder of the housing at Berryfields. ~~There are approximately 1,180 dwellings still to come forward. While some~~ Some of the other planned requirements, including education, community and transport, are in place ~~there has been limited~~ and progress is underway ~~on providing~~ to provide the local centre and employment areas.
MM55C	90	4.85	*Amend first sentence;* ~~2,335~~ 2,885 dwellings and the western link road have already been developed, with ~~919~~ 487 dwellings still to be built. *Add new final sentence;* The site is projected to be completed by 2025.
MM56	90	4.87	*Delete paragraph*
MM57	92	D-AGT5	*Add new row below size (hectares);* **Completions and expected time of delivery** 2,885 homes built up to 2020, 487 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033 *Amend Site-specific requirements, first sentence and clauses a and c and add clause f;* Development proposals must be accompanied by the information required in the Council's Local Validation List and comply with all other relevant policies in the Plan, including the principles of development for Aylesbury Garden Town ~~and the Masterplan SPD to be prepared for the site~~. a. employment allocation of 9ha split on two sites with a range of employment uses and space for start-up units in high quality buildings. The proposed development will add variety to the portfolio of employment in Aylesbury and retain existing provision c. the district centre is located at the intersection of the principal road, pedestrian and cycle networks, and consideration should be given to design to ensure public transport and sustainable travel choices are maximised whilst recognising proximity to the new railway station f. achieve a form of development comprising distinctive

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			linked / coalesced 'urban villages' with a diversity of layout and design which reflects the range of 'local distinctiveness'. *Amend Implementation Approach;* Design proposals for both the employment allocation and district centre should be in line with the Berryfields MDA Development Brief (2004) and design codes and the Aylesbury Garden Town development principles within policy D1 and the subsequent supporting Aylesbury Garden Town Framework and Infrastructure ~~Supplementary Planning Documents (~~SPD~~s)~~.
MM58	93	4.91	*Amend;* The housing development is based on the principle of creating three villages within the overall framework of the site. Reserved matters have been approved for ~~two of the three villages, Oakfield Village and Orchard Green, comprising 1,353~~ 2,074 dwellings of which some ~~300~~ 696 are complete ~~or~~ with more under construction. Key elements of transport infrastructure including the Eastern Link Road and Stocklake Link are also well under way. The status of the three villages is as follows: • Oakfield (village 2) – detailed permission for 492 dwellings (14/03486/ADP) and is now complete • Canal Quarter (village 3) for 1,097 dwellings o Phase 1 for 228 dwellings (18/01153/ADP) is now complete o Phase 2a for 383 dwellings (19/01732/ADP) is under construction o Phase 2b for 110 dwellings and the neighbourhood centre (19/02983/ADP) has detailed permission o Phase 3 for 212 homes (20/00740/ADP) has an as yet undetermined detailed application o Phase 4 for 164 dwellings and the employment area (19/04426/ADP has an as yet undetermined detailed application • Orchard Green (village 4) – detailed permission for 861 dwellings (15/01767/ADP) and under construction The site is expected to be completed by 2031.
MM59	94	4.99	*Delete paragraph*
MM60	94	4.101	*Delete paragraph*
MM61	96	D-AGT6	*Add new row below size (hectares);* **Completions and expected time of delivery** 696 homes built up to 2020, 950 homes to be delivered 2020-2025 and 804 homes to be delivered 2025-2033 *Amend site specific requirements first sentence and clauses a, e, h and I and add clause k;* Development proposals must be accompanied by the information required in the Council's Local Validation List and comply with all other relevant policies in the Plan, including

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

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

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MM66	105	D-AYL077	*Delete this site allocation policy*
MM67	106	D-AYL063	*Amend phasing row;* ~~**Phasing**~~ **Expected time of delivery** ~~Delivery within 1-5 years of VALP adoption~~ 112 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clause a;* a. The site will comply with a development brief that will steer proposals to make provision for ~~around~~ at least 112 dwellings at a density that takes account of the adjacent settlement character. The site should also retain its retail (~~A1~~E/F.2) provision on the ground floor
MM68	107	D-AYL068	*Amend phasing row;* ~~**Phasing**~~ **Expected time of delivery** ~~Delivery within 6-15 years of VALP adoption~~ No homes to be delivered 2020-2025 and 39 homes to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clause a;* a. The site will make provision for at least 39 dwellings at a density that takes account of the adjacent settlement character. Part of the site should be retained for hospital services
MM69	108	D-AYL115	*Amend phasing row;* ~~**Phasing**~~ **Expected time of delivery** ~~Delivery within 6-15 years of VALP adoption~~ 65 homes to be delivered 2020-2025 and 135 homes to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clause a;* a. The site will make provision for ~~around~~ at least 200 dwellings at a density that takes account of the adjacent residential character north of the railway line
MM70	109	Preceding 4.110	*Insert new heading and new paragraph;* **Delivering site allocations in the rest of the district** In order to fulfil the level of growth for Aylesbury Vale set out in policy S2 Spatial Strategy for Growth, sites have also been allocated at other settlements in the district as well as at Aylesbury Garden Town. Allocating sites in the Local Plan allows growth to be located in the most suitable sites in the most sustainable locations by taking into account, through further assessment beyond the HELAA, factors such as landscape, flooding, settlement form and site availability. *Move former paragraph 4.123 to follow new paragraph, add new title;*

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

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			be developed in accordance with polices S1, S2, S3 and S5. The rest of the district outside of the Garden Town, including the windfall allowance will deliver 13,927 new homes. The Policies Map allocates the following major sites in the strategic settlements and in North East Aylesbury Vale for development: • D-NLV001 Salden Chase, Newton Longville • D-WHA001 Shenley Park, Whaddon • D-BUC043 Land west of AVDLP allocation BU1 Moreton Road, Buckingham • D-BUC046 Land off Osier Way (south of A421 and east of Gawcott Road), Buckingham • D-HAD007 Land north of Rosemary Lane, Haddenham • D-HAL003 RAF Halton • D-WIN001 Land to east of B4033, Great Horwood Road, Winslow The following sites are also allocated in large and medium villages: • D-STO008 Land south of Creslow Way, Stone • D-WHI009 Holt's Field, Whitchurch • D-CDN001 Land North of Aylesbury Road and rear of Great Stone House, Cuddington • D-CDN003 Dadbrook Farm, Cuddington • D-ICK004 Land off Turnfields, Ickford • D-MMO006 Land east of Walnut Drive and west of Foscote Road, Maids Moreton • D-NLV005 Land south of Whaddon Road and west of Lower Rd, Newton Longville • D-QUA001 Land south west of 62 Station Road, Quainton • D-QUA0014-016 Land adjacent to Station Road, Quainton The design and delivery of development at allocations in the rest of the district should adhere to the site specific allocation policies and other policies in the Plan. *Amend heading preceding paragraph 4.110;* ~~**Salden Chase**~~ **North East Aylesbury Vale**
MM71	109	4.112	*Amend;* ~~As a result of further assessment and taking~~ Taking account of the overall housing requirement for Aylesbury Vale, Salden Chase and Shenley Park ~~has~~ have been identified as the most appropriate strategic allocations to come forward at this stage.

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

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			Amend community facilities and Green Infrastructure; The site will need to make provision for a comprehensive network of multifunctional open spaces and green corridors including a linear park to the south of the site 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. The existing woodland priority habitat in the north of the site should be retained. Multi functional Green Infrastructure will be required to control surface water flows and flooding. Impact on the Howe Wood SSSI must be kept to a minimum and green links to Tattenhoe Park must be provided. *Insert additional clause;* **Flood Mitigation** Provision of a sustainable and strategic flood mitigation and urban drainage scheme linked to multi-functional Green Infrastructure must be provided. *Amend final sentence of Implementation Approach;* 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. *Insert concept plan for D-NLV001*
MM75	114	Following D-NLV001	*Insert new heading, four new paragraphs and new site policy;* **Shenley Park** The site covers an area of around 99 ha and is in predominantly agricultural use with 4.119 areas of woodland plantations. Surrounding land uses are similarly predominantly agricultural although the eastern boundary is defined by the Milton Keynes Boundary Walk, the existing residential development and land currently being developed as part of Milton Keynes. Other than the 11KV overhead powerlines crossing the site there are no other utilities 4.120 present that would significantly constrain the proposed development and sufficient new utility infrastructure can be provided. There is one footpath running across the southern part of the site. Long distance 4.121 bridleways run along the northern and eastern boundaries.

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

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

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			m. The scheme layout shall have regard to the findings of an archaeological investigation and preserves in situ any remains of more than local importance n. The development must provide a satisfactory vehicular access from the A421 Buckingham Road o. More detailed traffic modelling will be required to inform on the extent and design of off site highway works to determine whether the section of A421 between the Bottledump roundabout and the site access roundabout needs to be dualled. The scope and design of any detailed traffic modelling must be agreed by Buckinghamshire Council as the highway authority in consultation with the Milton Keynes highway authority. p. Provide for a Link Road connection through the site to Grid Road H6 Childs Way and/or H7 Chaffron Way which shall include • A Redway providing direct connection through the site to the existing Redway Network • A public transport route to incorporate Mass Rapid Transit through the site to Grid Road H6 Childs Way and/or H7 Chaffron Way q. Existing public rights of way need to be retained, enhanced and integrated into the development with safe and secure environments as part of a wider network of sustainable routes (utilising amongst others the Redway and Sustrans network), to directly and appropriately link the site with surrounding communities and facilities including the extension of bridleways into the site (Bridleway WHA12/2 and Shenley Brook End Bridleway 006) to Redway standard r. Provision of public transport service improvements and associated new facilities into Milton Keynes, including new or improved links to Bletchley railway station, and to surrounding areas s. An air quality and noise assessment shall be submitted to and approved in writing by the Council prior to development commencing t. A surface water drainage strategy will be required for the site, based on sustainable drainage principles and an assessment submitted to the Council for approval and should ensure that development does not increase flood risk elsewhere. The strategy will create new green infrastructure corridors along major surface flowpaths. Development on this site, which would drain into the management area for the Loughton Brook, will seek to reduce flood risk downstream on the Loughton Brook u. Detailed modelling will be required to confirm 1 in 20, 100 and 1,000 year extents and 1 in a 100 year plus climate change extents on the ordinary watercourse. Climate change modelling should be undertaken using the up-to-date Environment Agency guidance for the type of development and level of risk and should consider surface water risk. The impact of culvert blockage should be considered for the

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

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			~~areas of land in accordance with Policy D2~~. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner and meet all of the criteria in the Policy below. **D~~2~~3 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages** *Prior to the first line of the policy add the title* 1. Small scale development and infilling Development proposals in strategic settlements, larger and medium villages that are not allocated in this plan or in a made neighbourhood plan will be restricted to small scale areas of land within the built-up areas of settlements. Subject to other policies in the Plan, permission will be granted for development comprising: a. infilling of small gaps in developed frontages in keeping with the scale and spacing of nearby dwellings and the character of the surroundings, or b. development that consolidates existing settlement patterns without harming important settlement characteristics, and does not comprise partial development of a larger site *Following criterion b. and ahead of the next paragraph add the title* 2. Larger scale development Exceptionally further ~~Further~~ development beyond allocated sites and small-scale development as set out in criteria a) or b) above will only be permitted where the Council's monitoring of housing delivery across the district shows that the allocated sites are not being delivered at the anticipated rate. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner. The proposal must contribute to the sustainability of that settlement, be in accordance with all applicable policies in the Plan, and fulfil all of the following criteria: *Revise criterion c. as follows* c. be located within or adjacent to the existing developed footprint of the settlement * ~~or~~, except where there is a made neighbourhood plan which ~~includes~~ defines a settlement or development boundary, where the site ~~is~~ should be located entirely within that settlement boundary d. not lead to coalescence with any neighbouring settlement e. be of a scale and in a location that is in keeping with the existing form of the settlement, and not adversely affect its character and appearance f. respect and retain natural boundaries and features such as trees, hedgerows, embankments and drainage ditches g. not have any adverse impact on environmental assets such as landscape, historic environment, biodiversity,

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

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			consultation with Anglian Water. The water supply network is likely to require an ~~infrastructure~~ upgrade by Anglian Water to serve the level of growth on the site. The Buckingham Wastewater Treatment Works needs upgrading and the delivery of the site will need to be aligned ~~work~~ with ~~investment in~~ Anglian Water's ~~a~~Asset ~~m~~Management ~~p~~Plan ~~for delivering the needed upgrade. The surface water network capacity for the sewerage system also needs upgrading.~~ l. A financial contribution will be needed towards funding appropriate elements of the Buckingham Transport Strategy m. Amenity land which is to be provided with a NEAP and LEAP with sports pitches. The amenity land, subject to agreement, would be transferred to the Town Council following a maintenance period and a commuted sum paid to the Town Council for the upkeep of that land.
MM83	120	D-BUC051	*Delete allocation policy*
MM84	121	D-BUC046	*Amend size (hectares);* ~~25.8~~ 22.7ha *Amend current neighbourhood plan status;* Neighbourhood plan, made in October 2015. The land has no notation but is outside the settlement boundary. The neighbourhood plan is in early stages of review. *Amend phasing row;* **~~Phasing~~ Expected time of delivery** ~~100~~ 130 homes to be delivered 2020-2025 and ~~320~~ 290 homes ~~from~~ to be delivered ~~2024~~2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clauses a, d, e, and h and add i;* a. Provision of ~~around~~ at least 420 dwellings at a density that takes account of the adjacent settlement character and identity d. The development must provide a satisfactory vehicular access to be agreed with Buckinghamshire County Council. The ~~primary vehicular~~ access should be off Gawcott Road and Osier Way. A transport assessment will be required to demonstrate access and impact are acceptable and achievable by all modes of transport ~~e. An ecological management plan (EMP) shall be submitted to the Council for approval. Wooded areas on the site have a high ecology impact and these would need to be retained along with the provision of 20m buffer either side of the stream and pond~~ h. An assessment of sewerage capacity and water resources and water supply network will be required in consultation with Anglian Water. The water supply network is likely to require an ~~infrastructure~~ upgrade by Anglian Water to serve the level of growth on the site. The Buckingham Wastewater

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			Treatment Works needs upgrading and the delivery of the site will need to be aligned ~~work~~ with investment in Anglian Water's ~~a~~Asset ~~m~~Management ~~p~~Plan ~~for delivering the needed upgrade. The surface water network capacity for the sewerage system also needs upgrading~~. i. A financial contribution will be required towards funding appropriate elements of the Buckingham Transport Strategy.
MM85	123	D-HAD007	*Amend size (hectares) row;* ~~10 ha~~ 13.5 ha *Amend allocated for row;* ~~315~~ 273 homes *Amend phasing row;* ~~**Phasing**~~ **Expected time of delivery** ~~50~~ 128 homes to be delivered ~~2017-22~~ 2020-2025 and ~~265~~ 145 homes ~~from~~ to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clauses a and h;* a. Provision of ~~around~~ at least ~~315~~ 273 dwellings h. The site should be accessed via Churchway with the retention of the existing footpaths and further provision of pedestrian and cycle linkages through the site and into the village including along Churchway, to the train station and with connections with the adjoining approved Haddenham Airfield development ~~if appropriate and possible~~ (site HAD005 on the VALP Policies Map)
MM85A	125	4.135	*Amend penultimate sentence;* Therefore it is considered that redevelopment and/or refurbishment of existing buildings in the first phase of development would be appropriate ~~and not require that the site be removed from the Green Belt at this stage~~.
MM86	125	4.136	*Add;* The amount and quality of existing sports provision within the allocation and elsewhere around the camp is a valuable asset which is why policy D-HAL003 requires its retention wherever possible in any proposed redevelopment.
MM87	125	4.137	*Amend;* ~~The development of this site will adhere to the following place-shaping principles:~~ • In the first phases, development will be concentrated on those areas that are already built-up, through the redevelopment or remodelling of existing buildings. ~~• Provision of 50% green infrastructure, to reflect the high level of open space already present on the site including green corridors linking development with the surrounding countryside~~ ~~• Provision of links to and from Aylesbury Town and to the wider area including for walking and cycling~~ • ~~Respond positively to the best characteristics of the surrounding area.~~

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

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MM89	127	D-WIN001	*Amend allocated for row;* At least ~~585~~ 315 homes and green infrastructure *Amend phasing row;* **~~Phasing~~ Expected time of delivery** ~~50~~ 140 homes to be delivered ~~2017-22~~ 2020-2025 and ~~535~~ 175 homes ~~from~~ to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clauses a, d and e;* a. Provision of ~~around~~ at least ~~585~~ 315 dwellings d. The built form of the development will be limited to areas outside of those shown on the VALP Policies Map as 'Not built development'. ~~The development will limit built form beyond the watercourse, development will only be to the south of this nearest to the existing built-up area and the proposed railway station~~ e. The existing trees, hedgerows and ponds should be retained or if necessary replanted and where possible integrated into the green infrastructure provision. There should be an ecological buffer provided along the watercourse to the north of the site
MM89A	129	4.141	*Amend;* Larger villages are the largest, most sustainable villages that have reasonable access to services and facilities. As set out in Policies S2 and S3, larger villages will provide a total of ~~2,271~~ 2,408 new homes between 2013 and 2033. Those sites that already have planning permission (as at ~~2017/18~~ 2019/20) and homes already built in the period 2013-~~2018~~ 2020 are included in the total to be provided.
MM90	129	4.143	*Delete;* • ~~Steeple Claydon (118)~~ *Amend;* • Stone (~~10~~ 26)
MM91	129	4.145	*Amend;* Sites allocated in this Plan or in a made Neighbourhood Plan or committed by planning permission will normally deliver Aylesbury Vale's required level of growth in full. Proposals for development in other locations will be determined on the basis of the policies within this Plan and made Neighbourhood plans. Exceptionally additional larger scale d~~D~~evelopment proposed in the larger villages on land that is not allocated in the Local Plan or a neighbourhood plan will only be permitted ~~in exceptional circumstances~~ where it can be demonstrated through the council's monitoring of housing delivery that sites allocated are not being delivered ~~coming forward~~ at the rate anticipated. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner, along with satisfying each of the criteria set out in policy ~~D2~~ D3 above.

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MM92	130	4.146, 4.147D-SCD003	*Delete allocation policy and supporting paragraphs*
MM93	131	D-SCD008	*Delete allocation policy*
MM94	132	D-STO008	*Amend allocated for row;* ~~10~~ 26 homes, green infrastructure *Amend phasing row;* **~~Phasing~~ Expected time of delivery** ~~The site is expected be delivered between 2017 and 2022~~ 26 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clause a;* a. Provision of ~~around~~ at least ~~10~~ 26 dwellings
MM95	133	D-WHI009	*Amend phasing row;* **~~Phasing~~ Expected time of delivery** ~~The site should be delivered during 2018-2023~~ 22 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033 *Amend;* **Site ~~criteria~~ specific requirements** *Amend clause a;* Provision of ~~around~~ at least 22 dwellings at a density that takes account of the adjacent settlement character and identity
MM95A	134	4.151	*Amend;* Medium villages are moderately well served with services and facilities and can therefore be considered to be reasonably sustainable villages. As set out in Policies S2 and S3, medium villages will provide a total of ~~1,282~~ 1,423 new homes between 2013 and 2033. Those sites that already have planning permission (as at ~~2017/18~~ 2019/20) and homes already built in the period 2013- ~~2018~~ 2020 are included in the total to be provided.
MM96	134	4.153	*Amend;* Allocations are therefore made at the following medium villages: • Cuddington (~~21~~ 23) • Ickford (~~20~~ 30) • Maids Moreton (170) ~~• Marsh Gibbon (9)~~ • Newton Longville (17) • Quainton (37)
MM97	134	4.154	*Amend;* Sites allocated in this Plan or in a made Neighbourhood Plan or committed by planning permission will normally deliver

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

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

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

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

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

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

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

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

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

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

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

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MM153	177	5.57	*Amend;* As set out ~~in~~ at paragraph 50 of the NPPF (2012), ~~plans~~ local planning authorities should ~~plan~~ aim for a mix of housing to meet the needs of different groups in the community - including the ~~elderly (paragraph 50)~~ older people. The Demographic projections in the HEDNA's housing needs assessment show that the population of Buckinghamshire is likely to increase by between 64,700 and 73,700 people over the 20-year period 2013 -2033. The number of people aged 75 or over is projected to increase by around ~~35,000~~ 32,100, approximately ~~around~~ half of the ~~total~~ projected growth. It follows that there is likely to be a significant need for housing which will be able to meet the needs of older people. ~~Those that do move home are therefore likely to need accessible housing that can meet the needs of older people. Specialist provision for older people is split into the following categories:~~ • ~~mainstream (including adapted and wheelchair homes)~~ • ~~specialised housing (including extra care and sheltered housing)~~ • ~~care homes (including both registered nursing and registered care homes)~~
MM154	178	5.58	*Amend;* The Buckinghamshire HEDNA Update 2016 identifies the following demand for housing for older people in Aylesbury Vale: *Amend first line, second column of table;* ~~+13,978~~ +12,727 *Amend third column of table;* ~~420~~ 380 ~~210~~ 190 ~~140~~ 130 ~~140~~ 130 80 ~~1,680~~ 1,530 ~~2,670~~ 2,440 ~~12.5%~~ 12.6%
MM155	178	5.59	*Amend;* ~~It is important to note that~~ The objectively assessed housing need (OAN) for the district's older people set out in the table above does not include the projected increase of the 75+ institutional population in Aylesbury Vale (which includes~~ing~~ older people in residential care homes and nursing homes (Use Class C2)). For the district, it is projected in the HEDNA that the institutional Class C2 population aged 75+ will increase by ~~1,160~~ 1,020 people over the plan period.

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

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

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

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

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

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			~~B1~~
MM176	183	E1	*Amend title and first sentences of clauses a, b and c;* **E1 Protection of key employment sites <u>and enterprise zones</u>** a. Within key employment sites (listed above and identified on the Policies Map) applications for ~~B1~~ <u>appropriate class E</u> ~~(light industrial)~~, B2 (general industrial, B8 (storage and distribution will be permitted. b. The use of key employment sites for employment purposes other than <u>appropriate class E</u> ~~B1~~, B2 and B8 may be appropriate, if it can be proven that the use provides on-site support facilities, or demonstrates similar economic enhancement to <u>appropriate class E</u> ~~B1~~/B2/B8 uses. c. Main town centre uses <u>that do not fall within appropriate parts of use class E, or other uses that do not fall within use classes B2 or B8</u> will not be supported, except as ~~an~~ ancillary facilit~~y~~<u>ies</u> to service a key employment site.
MM177	184	6.8	*Amend;* Where there is no reasonable prospect of an employment site being used for employment purposes, alternative uses may be considered. Where an application is made for an alternative use other than employment, ~~the following~~ information will be sought <u>to determine whether there are any reasons why the site is unsuitable for an employment use, if there are any other suitable sites in the vicinity and whether the site has been suitably marketed</u>~~:~~ ~~• a description of any problems caused by the employment use, together with any evidence, the measures considered to try and mitigate these issues, and an explanation of why these problems could not be overcome~~ ~~• any other reasons why the site is thought unsuitable for employment uses•~~ ~~details of how the property has been marketed, including for sale or rent, over what period and for what price (and how the asking price was calculated), what use(s) it was marketed for, where it was advertised, and whether there have been any offers received, and~~ ~~•what other suitable, viable, alternative sites are available locally for employment uses, (this should include an assessment of existing sites and premises, in addition to land allocated by the Local Plan and where appropriate neighbourhood plans).~~
MM178	185	E2	*Amend;* Outside key employment sites, the redevelopment and/or reuse of employment sites to an alternative <u>non-</u>employment use will normally be permitted provided all of the following

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

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			nature of the proposal and expected impact and will work proactively with applicants when scoping and agreeing the level of supporting retail information required.
MM184	188	6.20	*Delete paragraph*
MM185	189	E5	*Amend;* ~~A sequential test will be applied to planning applications~~ Proposals for main town centre uses that do not comprise small scale rural development and are not ~~in an existing centre.~~ within defined town centres[4] will undergo the following sequential test: Main T~~t~~own centre uses should primarily be located within defined town centres. If no suitable sites are available within defined town centres, main town centre uses should be located ~~in town centres, then~~ edge of defined town centre locations. Only when no suitable sites are ~~not~~ available in edge of defined town centre locations will out of town centre sites be considered. ~~In terms of~~ When considering edge of centre and out of ~~-town~~ centre proposals, preference ~~will~~ should be given to accessible sites that are well connected to the town centre. ~~Proposals outside defined~~ In assessing suitability, factors such as viability, town centre vitality and availability should be considered. In addition to the above sequential test, p~~P~~roposals for ~~non-food~~ retail and ~~food retailing~~ leisure, including extensions, on sites not allocated in plans and located outside defined town centres will be granted if the proposal would not have a significant adverse impact on the vitality and viability of the defined town centres, either as an individual development or cumulatively with similar existing or proposed developments. An impact assessment submitted with the application if the proposal is likely only to affect the Aylesbury town centre and if the proposal is 1,500 square metres or more, or, if the proposal is likely to affect any other defined town centre, and the proposal is 400 square metres or more will assist the council in making this assessment. ~~a. The proposal does not have a significant adverse impact on the vitality and viability of the defined town centres, either as an individual development or cumulatively with similar existing or proposed developments;~~ ~~b. The proposed retail development on out-of-centre sites will need to demonstrate that no suitable site can be found, firstly within the existing town or local centre or, secondly, on the edge of the centre. Any assessment of suitability should consider factors such as viability and availability~~ ~~c. Proposals over the floor space threshold of 400 sqm are accompanied by a full assessment of the potential impact on town centres and nearby centres~~ ~~d. Proposals less than the above floor space threshold are~~

[4] As defined in the Glossary

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

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

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

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

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			of existing accommodation in the countryside. In order to support existing businesses therefore, the expansion of built tourist accommodation and sites ~~will be allowed where this~~ in a way that will improve~~s~~ the quality of the accommodation on offer and the appearance of the site, ~~provided that~~ as long as ~~the~~ there is no significant harm ~~and development would be consistent with the other policies of this Plan~~ to the surrounding area, may be allowed subject to the details of a proposal.
MM193	193	6.35	*Amend;* The information required in support of applications is likely to vary greatly depending on the nature of the proposal, its scale and location. Proposals for accommodation in less accessible locations should normally include more information on things like the long-term viability of the enterprise, ~~a clear justification of~~ why such a less accessible location is needed, and what the benefits to the local area might be ~~economy. As a town centre use, hotels should also comply with Policy E2. Where the impact of a new out-ofcentre hotel would undermine the viability and contribution of more central hotels, or prejudice the potential to secure further hotel development on a more central site, development should be refused~~.
MM194	193	6.36	*Amend;* Tourist accommodation like hotels and guest houses provides a critical support to tourist attractions and facilities and contributes to the economy through its support of retail, food and drink and travel services. It is therefore important to ensure that the loss of accommodation stock is carefully considered, particularly with regard to the hotels and larger guesthouses in the area due to the potential impact of a loss. ~~As a guide this means those that have at least six guest bedrooms.~~ However it is also important to recognise that changes in the market will mean that some types of built tourist accommodation may become less attractive to visitors. If the offer cannot be improved, then falling profits would probably result in poorly maintained and ultimately failing accommodation, neither of which is a desirable outcome. ~~A~~ Therefore the council will take a flexible approach ~~will be needed~~ in assessing to what extent the loss of such facilities should be resisted. Applicants will be required to demonstrate that real effort has been made to retain the tourist accommodation in accord with the requirements of the policy. ~~Evidence submitted should typically include~~ ~~• reasons why there is no longer a market for the premises in its tourist function~~ ~~• details of how the property has been marketed, the length of time that the marketing was active and any changes during this period, the sale asking price, the level of interest~~

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

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

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			opportunity for a single coordinated approach to planning improvements and upgrades to the transport network and will form a key transport policy document for both BCC and AVDC. The focus of the strategy is Aylesbury town centre and its immediate urban area, however the growth and travel patterns were considered in a much wider context, including most of the Aylesbury Vale area~~. A list of mitigation schemes can be found in the Aylesbury Transport Strategy which is on the Council's website.~~
MM203	202	7.6	*Amend;* ~~The ATS will be used to justify the~~ Transport measures and interventions contained in the ATS are required to facilitate growth in the Aylesbury Garden Town. The key measures and interventions are set out in Policy [T3] below and supported by the Infrastructure Delivery Plan. The proposed growth will be planned in a way which minimises the need to travel by private car, with more and more people choosing to walk, cycle or use public transport. Traffic growth will be managed to control congestion and provide opportunities to significantly maximise infrastructure improvements including: • increased public transport, building on the success of the Aylesbury Rainbow bus routes • increased walking and cycling facilities, building on the success of the Aylesbury Gemstone cycleways • improving road infrastructure linking new developments to the town, which will create a series of link roads around the town • enhancements to the regional rail infrastructure linking us to neighbouring growth areas
MM204	202	7.8	*Amend;* The growth aspirations in the ~~Plan~~ VALP are likely to have an impact on transport requirements in Buckingham; ~~any~~ and may therefore necessitate a number of improvements in/around the town. The aim of the Buckingham Transport Strategy (BTS) is to consider these growth aspirations holistically and propose measures that address their impacts as a whole, rather than the impact of each individual development and support schemes contained in VALP.
MM205	202	7.10	*Delete and substitute;* The BTS has been used as one of a series of evidence documents to support the infrastructure identified in VALP under Policy T3.
MM206	203	T1	*Amend;* ~~Development proposals should be consistent with and contribute to the implementation of the transport policies and objectives set out in the Buckinghamshire Local Transport Plan 4 (LTP). The Council, Buckinghamshire County Council and, where appropriate, Highways England, will work together to achieve the objectives and implement~~

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			~~the proposals in the LTP, with particular emphasis~~ The strategy to deliver sustainable transport in Aylesbury Vale is based on encouraging modal shift with greater use of more sustainable forms of transport and improving the safety of all road users. The Council, and, where appropriate, Highways England, will ~~aim~~ work together to achieve this strategy and those improvements required to deliver it. The Council will seek to ensure that development proposals will deliver ~~the improvements identified in the~~ highway and transport ~~studies that underpin the Local Transport Plan~~ improvements to ensure new housing and employment development identified in the Local Plan period does not create ~~a significant negative~~ severe impact on the highway and public transportation network and encourages modal shift with greater use of more sustainable forms of transport. The Council will assist in delivering the pedestrian, cycle, public transportation and public realm ~~improvements identified in Aylesbury town centre through~~ to deliver the Aylesbury Garden Town initiative ~~and Aylesbury Transport Strategy~~ as well as ~~the proposed~~ any required improvements to the transportation network in Buckingham ~~through~~ and other areas of ~~the Buckingham Transport Strategy~~ Aylesbury Vale as required to ~~help create~~ deliver sustainable, healthy and thriving communities.
MM207	203	7.12	*Delete paragraph*
MM208	205	7.20	*Delete paragraph 7.20 and insert;* **Local Schemes** Local transport schemes identified below and in Policy T3 are defined as critical for the reason that they are essential to enable or unlock strategic housing and employment floor space essential to deliver the scale of growth identified in the Plan.
MM209	205	T2	*Amend title and second paragraph;* **T2 ~~Protected~~ Supporting and protecting Transport Schemes** The Council will continue to work with High Speed 2 Ltd with the aim of influencing the design and construction of the route through Aylesbury Vale to minimise adverse impacts and maximise any benefits that arise from the proposal including support of the Stoke Mandeville A4010 realignment. Subject to being within the provisions of the Act, the implementation of HS2 will also be expected to:
MM210	205	T3	*Amend;* **T3 Supporting local transport schemes** The ~~Council~~ council will actively support key transport proposals including those identified in both the Aylesbury

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

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			not covered by the standards set out in Appendix B then the following criteria will be taken into account in determining the appropriate level of parking: a. The accessibility of the site, including the availability of public transport, and b. The type, mix and use of development c. Local car ownership levels d. Security and public realm e. Provision for both on street and off street parking where appropriate ~~Garages/integral garages/car ports will not be included within the allocation of parking spaces unless they meet a minimum internal size as set out in the design SPD.~~ ~~Design must enable and encourage the maximum use of sustainable modes of transport, including provision for cyclists and low emission vehicles. Within Aylesbury, Buckingham, Haddenham, Wendover, and Winslow infrastructure for electric vehicles should be built into new major development schemes where local centres are proposed.~~ ~~Vehicle parking standards will be set out in the design SPD.~~ Rear parking courts will only be provided in exceptional circumstances where no alternative parking can be provided and where the rear parking court is well located in terms of the development it serves, is overlooked, enclosed and secure. The provision of garages and/or car ports will not be counted as a parking space for a development unless they are of at least the size set out in Appendix B.
MM215	208	T6 (becomes T7)	*Amend clauses a, b and c;* a. The delivery of a strategic cycle network and improvements to the footpaths will be supported in accordance with ~~any county-wide or local cycle strategies~~ schemes identified in Policy T3 Supporting Local Transport Schemes and in the IDP Appendix b. ~~The Council will protect existing cycle routes from adverse effects of new development.~~ In dealing with planning applications the Council will seek new or improved cycle access and facilities where necessary, including cycle storage, and will use planning conditions or legal agreements to secure such arrangement. c. ~~The Council will safeguard existing pedestrian routes from adverse effects of new development.~~ Development proposals must provide for direct, convenient and safe pedestrian movement and routes, connected where appropriate to the existing pedestrian network and alongside strategic routes. In deciding planning applications the Council will use planning conditions or legal agreements to secure the provision of new footpaths and the improvement of existing routes.

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

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

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

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

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

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			• Ashridge Commons & Woods • Aston Clinton Ragpits • Bacombe and Coombe Hills • Bierton Clay Pit • Bugle Quarry • Dancer's End • Dancer's End Waterworks • Finmere Wood • Foxcote Reservoir and Wood • Grendon and Doddershall Woods • Ham Home-cum-Hamgreen Woods • Ivinghoe Hills • Kings & Bakers Woods and Heaths • Long Herdon Meadow • Muswell Hill • Pilch Fields • Pitstone Hill • Pitstone Quarry • Poker's Pond Meadow • Rushbeds Wood • Shabbington Woods Complex • Sheephouse Woods Complex • Stone • Tingewick Meadows • Tring Reservoirs • Warren's Farm (Stewkley) • Weston Turville reservoir • Whitecross Green and Oriel Woods *Paragraph 9.4 to become 9.16 deleting final two sentences* *Paragraph 9.2 to become paragraph 9.60* *Delete paragraph 9.5*
MM225, MM226 and MM227 not used			
M228	222	NE1	*Amend;* **NE1 ~~Protected Sites~~ Biodiversity and Geodiversity Protected Sites** Internationally or nationally important Protected Sites (SACs and SSSIs) and species will be protected. Avoidance of likely significant adverse effects should be the first option. Development likely to affect the Chiltern Beechwoods SAC will be subject to assessment under the Habitat Regulations and will not be permitted unless any significant adverse

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

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

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

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			~~(as amended 2015 and any future review).~~ Development must recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment (LCA) their sensitivity to change and contribution to a sense of place. Development should consider the ~~role~~ characteristics of the landscape character area by ~~and~~ meeting all of the following criteria: a. ~~be grouped where possible with existing buildings to~~ minimise impact on visual amenity b. be located to avoid the loss of important on-site views and off-site views towards important landscape features c. ~~reflect~~ respect local character and distinctiveness in terms of settlement form and field pattern, topography and ecological value d. Carefully consider spacing, height, scale, plot shape and size, elevations, roofline and pitch, overall colour palette, texture and boundary treatment (walls, hedges, fences and gates) e. minimise the impact of lighting to avoid blurring the distinction between urban and rural areas, and in areas which are intrinsically dark and to avoid light pollution to the night sky f. ensure that the development is ~~buildings and any outdoor storage and parking areas are~~ not visually prominent in the landscape, and g. not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value The first stage in mitigating impact is to avoid any ~~the~~ identified significant adverse ~~harmful~~ impact. Where it is accepted there will be harm to the landscape character, specific on-site mitigation will be required to minimise that harm and, as a last resort, compensation may ~~will~~ be required appropriate as part of a planning application. This reflects the mitigation hierarchy set out in paragraph 152 of the NPPF (2012). Applicants must consider the enhancement opportunities identified in the LCA and how they apply to a specific site. The Policies Map defines areas of attractive landscape (AALs) and local landscape areas (LLAs) which have particular landscape features and qualities considered appropriate for particular conservation and enhancement opportunities. Of the two categories, the AALs ~~areas of attractive landscape~~ have the greater significance. Development in AALs and LLAs should have particular regard to the character identified in the report 'Defining the special qualities of local landscape designations in Aylesbury Vale District' (Final Report, 2016) and the LCA (2008). Development will be supported where appropriate mitigation

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			to overcome any adverse impact to the character of the receiving landscape has been agreed. ~~Development that adversely affects this character will not be permitted unless appropriate mitigation can be secured.~~ Where permission is granted, the Council will require conditions to best ensure the mitigation of any harm caused to the landscape.
MM235	237	NE8	*Amend;* Subject to the development allocations set out in the VALP, the Council will seek to protect the best and most versatile farmland for the longer term. Proposals involving development of agricultural land shall be accompanied by an assessment identifying the Grades (1 to 5) Agricultural Land Classification. Where development involving best and more versatile agricultural land (Grades 1,2 and 3a) is proposed, those areas on site should be preferentially used as green open space and built structures avoided. Where significant development would result in the loss of best and more versatile agricultural land, planning consent will not be granted unless: a. There are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, and b. The benefits of the proposed development outweighs the harm resulting from the significant loss of agricultural land.
MM236	239	NE9	*Insert after second paragraph;* Development that would lead to an individual or cumulative significant adverse impact on ancient woodland or ancient trees will be refused unless exceptional circumstances can be demonstrated that the impacts to the site are clearly out weighed by the benefits of the development. *Amend fourth, fifth and sixth paragraphs;* Where species-rich native hedgerow (as commonly found on agricultural land) loss is unavoidable the developer ~~needs to~~ must compensate for this loss by planting native species-rich hedgerow, which. This should result in a net gain of native hedgerow on the development site. Developers should aspire to retain~~ing~~ a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25m natural buffer around woodlands) for the benefit of wildlife, incorporating a dark corridor with no lighting. Development must provide buffers to Ancient Woodland and should provide additional planting to join up fragmented areas of woodland as part of the development's GI. Buffers should allow the maximum space proportionate to the development, and would generally be expected to be a minimum of 50m between the ancient woodland and any built development or grey infrastructure. Within the buffer, native trees may be planted along with other ecology

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

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MM241	243	C1	*Amend clauses a, h and l and insert two new clauses between clauses e and f;* a. Conversion works should not involve major reconstruction or significant extensions and should respect the character of the building and its setting, <u>except in exceptional circumstances where it can be demonstrated that dereliction was the result of severe accidental damage or accidental destruction in the past two years</u> *(new clause)* <u>f. The existing building is not located well away from existing settlements and is not located where utilities are not available</u> *(new clause)* <u>g. The existing building is not damaging to the surrounding character by virtue of a utilitarian appearance or cladding in unattractive materials</u> h. Any extension to the existing barn conversion is modest in scale, ancillary in nature, subordinate to the main building, ~~and~~ in keeping with the rural character, <u>designed with sensitivity to the host building and will enhance the character and appearance of its immediate surroundings.</u> l. Conversion works should not adversely impact upon wildlife using the structure. If impacts to nesting sites are unavoidable mitigation will be required (see Policy NE~~2~~ <u>1</u>).
MM242	248	C2	*Amend clause g, insert new clause to follow clause n, amend clause o and insert new clause to follow clause o;* g. The scale, construction and appearance of the proposed development including the entrance and boundary treatment should be designed to minimise adverse impact on the <u>immediate locality,</u> landscape character and residential amenity. n. any new buildings and ancillary facilities would be erected to integrate with the existing building (or group of buildings), <u>and</u> <u>o. be supported by a business plan that shows the proposed enterprise has a sound financial basis</u> o *(to become p)*. it <u>can be justified in that location and</u> is of a size and scale appropriate to the existing commercial enterprise, or the number of privately kept horses that will use the facility, <u>q. any floodlighting is reasonably necessary and at an appropriate level for the use,</u> and *(p becomes r)*
MM243	252	C3	*Insert at start;* <u>All development schemes should look to achieve greater efficiency in the use of natural resources.</u> *Insert after first paragraph;* <u>The Council will seek to ensure that all development schemes achieve greater efficiency in the use of natural resources, including measures minimise energy use, improve water efficiency and promote waste minimisation and</u>

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

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			Add at end of existing text; (water related green infrastructure is also known as 'Blue Infrastructure'). Where the VALP site allocations require (or development coming forward on any other site that would be required to meet the standards in Policy I1) the provision of 'green infrastructure', private green spaces such as residential gardens do not count towards meeting this requirement as they are not publicly accessible natural green space and so do not meet Natural England's definition of ANGSt in para 11.8
MM247	256	11.2	*Amend;* Well-planned multi-functional green infrastructure is an important component of achieving sustainable communities. Green infrastructure helps to deliver conservation and enhancement of biodiversity, create a sense of place and appreciation of valuable landscapes and cultural heritage, increase recreational opportunities and support healthy living, improve water resources and flood management as part of environmentally sustainable design. It can also positively contribute~~s~~ towards~~;~~ combating climate change through adaptation and mitigation of impacts and production of food, natural fibre and fuel. It helps deliver NHS initiatives around improving people's health and tackling obesity. The district's high quality green infrastructure is a vital asset and an important element in ensuring that the district is somewhere people choose to live and locate their businesses. Policy I1 below will be used to ensure a green infrastructure network is provided ~~across~~ throughout the district with enhancements ~~helping~~ to ~~replace~~ remedy existing green infrastructure deficiencies.
MM248	256	11.4	*Delete and substitute;* The following Green Infrastructure Strategies cover Aylesbury Vale at varying hierarchal levels: • **Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire & Milton Keynes (2016)**. County-wide. Produced by the Buckinghamshire and Milton Keynes Natural Environment Partnership ("NEP"), the Vision and Principles set out 9 Principles which should be followed to achieve the NEP vision by 2030. • **Buckinghamshire Green IDP (2013)** County-wide. The Delivery Plan includes specific project areas in the district, particularly Whaddon Chase, west of Milton Keynes and Aylesbury Linear Park. Part of Aylesbury Linear Park is being delivered through Berryfields and Kingsbrook (Aylesbury East) Major Development Areas (MDA's). Kingsbrook will provide approximately 100ha of wetlands park. Further development sites around Aylesbury should deliver green infrastructure in-line with the Delivery Plan. • **Aylesbury Vale Green Infrastructure Strategy (2011)** District-wide detail. The Green Infrastructure

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			Strategy follows on from the 2009 Buckinghamshire Green Infrastructure Strategy. These strategies identified green infrastructure deficiencies within the district – for example, 69% of dwellings do not meet any of Natural England's Accessible Natural Green space standards (ANGSt). Priority areas identified include North Aylesbury Vale and Aylesbury Environs. • **Aylesbury Garden Town** will have an accompanying Masterplan which will set out how Green Infrastructure will be integrated into new and existing Garden Town developments. *Insert footnote links to the documents referred to in bold*
MM249	256	11.5	*Delete and substitute five new paragraphs;* The 'Assessment for Open Space, Sports and Recreation Needs for Aylesbury Vale: Final Report' (2017) identifies typologies of green infrastructure, current provision of green infrastructure, provision standards and future need based on applying those standards. The 2017 Final Report makes clear that green infrastructure is able to cover any number of the typologies identified. It also identifies specific green infrastructure features which can enhance the sport and recreational value of green space while not duplicating other provision in an area. Therefore, the approach in the VALP Policy I1 is for Green Infrastructure to perform a range of functions where possible in order to enhance the sport and recreation value of green space. The 2017 final Report also identifies accessibility/quantitative and qualitative standards to be applied to new development. These standards have been incorporated into the VALP to be applied for larger new housing developments or mixed use proposals including an element of housing. Quantitative standards are the size of green space provision. Accessibility standards represent a zone of influence of a provision and the distance that people are prepared to travel. The standards to be used are the ANGSt, developed nationally in the 1990s and reviewed by Natural England in 2008. These standards were also recommended in the Aylesbury Vale Green Infrastructure Strategy 2011. The ANGSt are a response to Natural England's belief that everyone should have access to good quality natural greenspace near to where they live. The three underlying principles of ANGSt are: Improving access to greenspaces; Improving naturalness of greenspaces; and Improving connectivity with greenspaces. The distances in the ANGSt are based on research into the minimum distances people would travel to experience the natural environment. In terms of meeting the ANGSt, to be 'Accessible' a place must be "available for the general public to use free of

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

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			corridors and to ensure new links are provided between existing green spaces. Local green space designations, which are ~~a fairly new concept~~ now commonplace in neighbourhood plans, will ~~mean~~ provide protection for those areas, as outlined in Policy NE6. Green infrastructure should ensure permeability for wildlife through development and provide sufficient beneficial habitat to support target species, independent of its connective function. The incorporation of sustainable drainage systems can contribute to green infrastructure provision as well as help~~ing~~ to alleviate flooding and ~~bringing~~ providing other biodiversity benefits. New landscaping areas are important and will be required in larger development schemes to assimilate development into the landscape and assist in the transition between the urban and rural boundary. The size and location of green infrastructure is expected to be suitable for the function it is intended to fulfil.
MM256	257	11.9	*Delete and substitute;* The accessibility/quantitative and qualitative standards will apply to development proposals of 10 homes or more and which have maximum combined gross floorspace of more than 1,000 square metres (gross internal area). These thresholds are a national standard in Planning Practice Guidance for securing infrastructure contributions through planning applications. It is also considered a threshold whereby at 10 or more homes the development is more likely to itself create a deficiency. Where the standards are applicable, development proposals will need to demonstrate to the Council that a development itself, with committed developments, would not create a deficiency.
MM257	258	11.10	*Delete and substitute two new paragraphs;* Long term stewardship of the public realm is important to ensure that open space provided from development is maintained to high standards. The Open Space, Sports, Leisure and Public Realm SPD will set out detailed guidance for the maintenance and adoption of open space, and will set out how maintenance is to be provided by a developer; at what time period land ownership should be transferred to the Council or other body; and how payments may be required towards future maintenance after the land transfer – including arrangements for Performance Bonds. In the case of open space not being provided on site, the SPD will also set out a calculation for the financial amount due as a developer contribution and the general approach to the use of such contributions. The SPD will set out the details as to how the policy and standards in Appendix C are to be implemented and guidance for where they will be appropriate for on or off site provision for open space, sports and leisure facilities (see Policy I2) and public realm. The SPD will also set out any possible exceptions to on or off site provision. Finally, the

Ref	Page	Policy / Paragraph	Main Modification
			SPD will set out any good practice which the Council suggests should be followed in terms of how open space, sports and recreation and public realm are provided in/from development.
MM258 and MM259 not used			
MM260	258	I1	*Delete and substitute;* Green infrastructure should provide a range of functions and provide multiple benefits for wildlife, improving quality of life and water quality and flood risk, health and wellbeing, recreation, access to nature and adaptation to climate change. The Council will support proposals for green infrastructure where there is no significant adverse impact on: a. Wider green infrastructure networks including public rights of way and green infrastructure opportunity zones identified by the Buckinghamshire and Milton Keynes Natural Environment Partnership b. Potential to contribute to biodiversity net gains c. Management of flood risk and provision of sustainable drainage systems d. Provision of a range of types of green infrastructure e. Provision of sports, recreation facilities or public realm improvements f. Potential for local food cultivation by communities g. Achieving a satisfactory landscaping scheme including the transition between the development and adjacent open land New housing developments of more than 10 homes or which have a combined gross floorspace of more than 1,000 square metres (gross internal area) will be required to meet the ANGSt (accessible natural green space standards) in Appendix C to meet the additional demand arising from new residential development. Amenity green space will need to be provided on site. Sports and recreation facilities can be provided as required (Policy I2) on the same site where these are compatible with publicly accessible green infrastructure. The Accessibility Standards in Appendix C will need to be met by providing accessible natural green space on or off site for developments of more than 10 homes and which have maximum combined gross floorspace of more than 1,000 square metres (gross internal area) unless it has been demonstrated in an assessment for a planning application that accessible natural green space provision has already been met, when including the increased population of the new development and any other committed development.

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

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

Ref	Page	Policy / Paragraph	Main Modification
			important to ensure facilities provided from development are maintained to high standards. The Open Space, Sports, Leisure and Public Realm SPD will set out detailed guidance for the maintenance and adoption of facilities. The SPD will cover how maintenance is to be provided by a developer; at what time period land ownership should be transferred to the Council or another body; and how payments may be required towards future maintenance after the land transfer. In the case of facilities not being provided on site, the SPD will also set out a calculation for the financial amount due as a developer contribution and the general approach to what such contributions will be used for. The SPD will set out guidance for where it will be appropriate for on or off site provision for open space, sports and leisure facilities (see Policy I2) and public realm. The SPD will also set out any possible exceptions to on or off site provision. The SPD will set out arrangements in general terms for Performance Bonds which will cover the expenses associated with the provision, maintenance and administration of open space, sports and leisure facilities and public realm. Finally, the SPD will set out any good practice which the Council suggests should be followed in terms of how open space, sports and recreation and public realm are provided in/from development. A new Sports and Leisure Facilities SPD and new Ready Reckoner are in preparation to be completed in early 2019 once the VALP has been adopted. These documents will further detail how Policy I2 is to be implemented on individual planning applications, provide advice on onsite and off-site provision and explain when financial contributions would be sought. These documents will replace the 2004 Sports and Leisure Facilities SPG and 2005 Ready Reckoner, providing details on what developments should provide. The documents will be developed utilising the standards in Chapter 6 of the 2017 Assessment of Open Space, Sports and Recreation Needs for Aylesbury Vale (CD/SLB/001). In addition, an Aylesbury Vale Built Facilities Strategy and Aylesbury Vale Playing Pitch Strategy are being prepared for completion in early 2019.
MM263, MM264, MM265, MM266 and MM267 not used			
MM268	260	I2	*Delete and substitute;* The council will support development proposals involving the provision of new sport and recreation facilities that are accessible by pedestrians and cyclists and public transport

Ref	Page	Policy / Paragraph	Main Modification
			where available and have no unacceptable impact upon the following: a. visual, noise or other impact on public amenity including safety b. the highway network, c. on wildlife and habitats d. the historic environment, e. flooding or drainage New housing development of more than 10 homes or which have a combined gross floorspace of more than 1,000 square metres (gross internal area) will be required to meet the Council's adopted standards in Appendix D to secure adequate provision of sports and recreation facilities increased capacity to meet the additional demand for sports and recreation facilities arising from new residential development. Facilities are required to be provided on-site except where off-site provision is acceptable according to the circumstances in Appendix D. Accessible natural green space required through Policy H7 will be treated separately to formal outdoor sports areas, equipped play facilities and allotment provision, which may be located within or outside such accessible natural green space, on land that is in addition to the accessible natural green space required under Policy I1. Conditions will be imposed on permissions or planning obligations sought in order to secure appropriate sport and recreation facilities reasonably related to the scale and kind of housing proposed. The recreational benefits to be obtained or provided by the Council by virtue of the obligation will be directly relevant to the development permitted and the needs of its occupiers and fairly and reasonably related to its scale and kind. Any proposals involving the loss of existing sports and recreation facilities will only be accepted where any of the following criteria are met: f. An assessment has been undertaken which has clearly shown the sports and recreation facilities are surplus to requirements and their loss is not detrimental to the delivery of the Playing Pitch Strategy or Built Facilities Strategy; or g. The development will significantly enhance the Open Space network as a whole and help achieve the Council's most recently adopted Green Infrastructure Strategy. In some cases, enhancements could be provided at nearby locations off site; or h. The loss of sports and recreation facilities would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or i. The developments is for other types of sports or recreational provision or ancillary development associated with the Open Space and the needs for which clearly

Ref	Page	Policy / Paragraph	Main Modification
			outweigh the loss Sports and recreation facilities being provided must have a long term management and maintenance strategy agreed by the Council and shall set out details of the owner, the responsible body and how the strategy can be implemented by contractors. The policy applies to all types of sports and associated built facilities required for their operation or facilities of a more community nature where sports can take place within. This includes sports halls, swimming pools, community centres and village halls, artificial grass pitches (such as for football), grass playing pitches (such as for cricket), climbing walls, stadia and facilities for outdoor and indoor tennis, outdoor and indoor bowls, athletics, golf, health and fitness, squash and climbing walls. Formal outdoor sports areas providing facilities for football, netball, cricket, hockey, rugby and other sports should be treated separate to ANGSt so these areas can function to ensure financial sustainability. Facilities are usually hired for a fee and may include built facilities such as a pavilion or club house. Access is controlled and to maximise day time use the facility should ideally be colocated/shared with a school, college, community hall, sports club or other facility.
MM269	262	11.17	*Amend;* The Council will ~~refuse~~ therefore generally aim to resist proposals that would result in the erosion of the valuable community facilities and services in the Vale, unless it can be clearly demonstrated that there is no long-term requirement for their retention. In the case of a proposal affecting a commercial venture which operates as a community facility, ~~the applicant will need to satisfy the Council~~ it is important to establish that the existing use is no longer commercially viable and~~,~~ to prove that a genuine attempt has been made to market the enterprise as a going concern.
MM270	262	To follow 11.19	*Add new paragraph;* The Open Space, Sports, Recreation and Public Realm SPD will set out guidance for on or off site provision for open space, sports and leisure facilities (see Policy I2), public realm and also community facilities and community infrastructure required under Policy I3. The SPD will also set out any possible exceptions to on or off site provision.
MM271	262	I3	*Amend title, second paragraph and add third paragraph;* **I3 Community facilities, infrastructure and assets of community value** In considering applications for residential development, the Council will consider the need for new community facilities and community infrastructure arising from the proposal. Conditions will be imposed on permissions, or planning obligations sought in order to secure appropriate community

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

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

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

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

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

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

Table 1 to be inserted in MM 11

Table 1 Spatial strategy for growth in Aylesbury Vale

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

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

Table 2 to be inserted in MM12

Table 2 Proposed settlement hierarchy and housing development

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

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

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

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

Table 8 to be inserted in MM25A

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

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

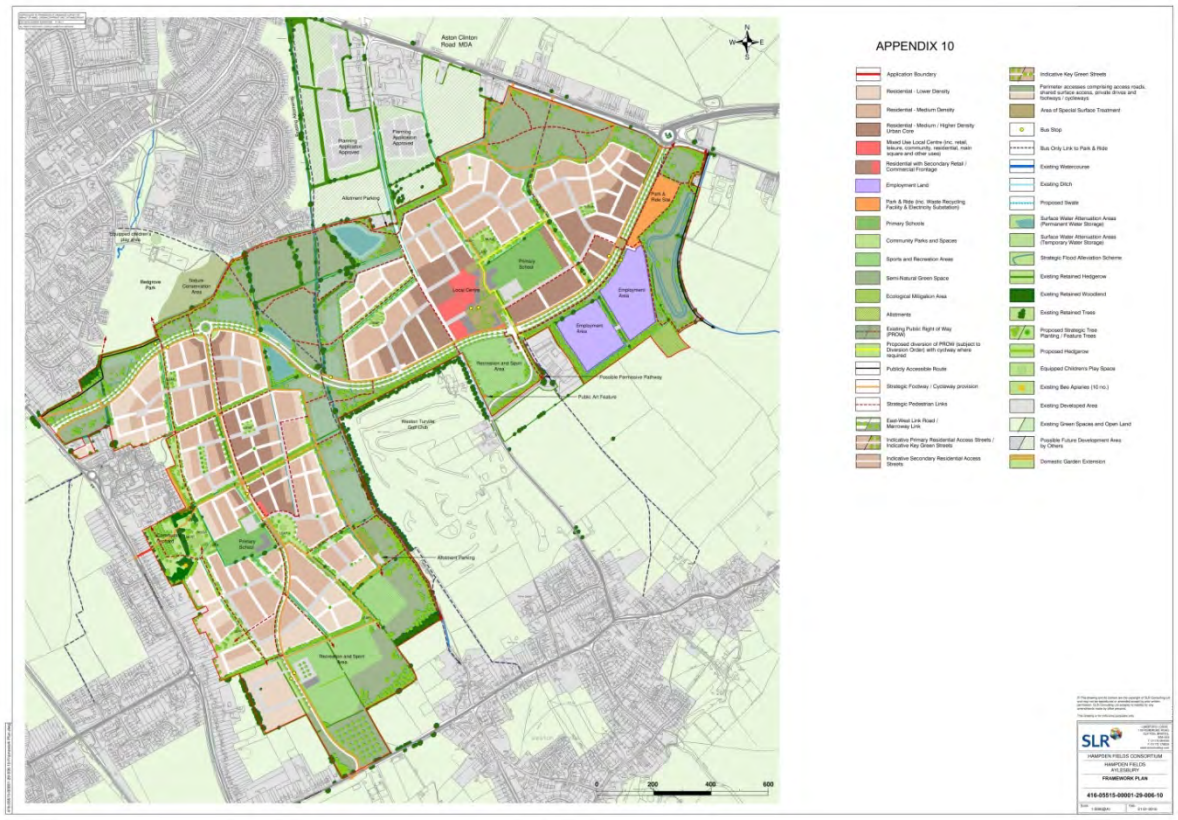
Concept plan to be included in MM48

D-AGT3 Woodlands (MM48)



Concept Plan to be included in MM55

D-AGT4 Hampden Fields (MM55)



Concept Plans to be included in MM61

D-AGT6 Kingsbrook village 3 phase 1 (MM61)



Village 3 phases 2a and 2b

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



Village 3 phase 3

D-AGT6 Kingsbrook village 3 phase 3 (MM61)



Village 3 phase 4
D-AGT6 Kingsbrook village 3 phase 4 (MM61)



D-AGT6 Kingsbrook village 4 (MM61)



D-NLV001 (MM74)

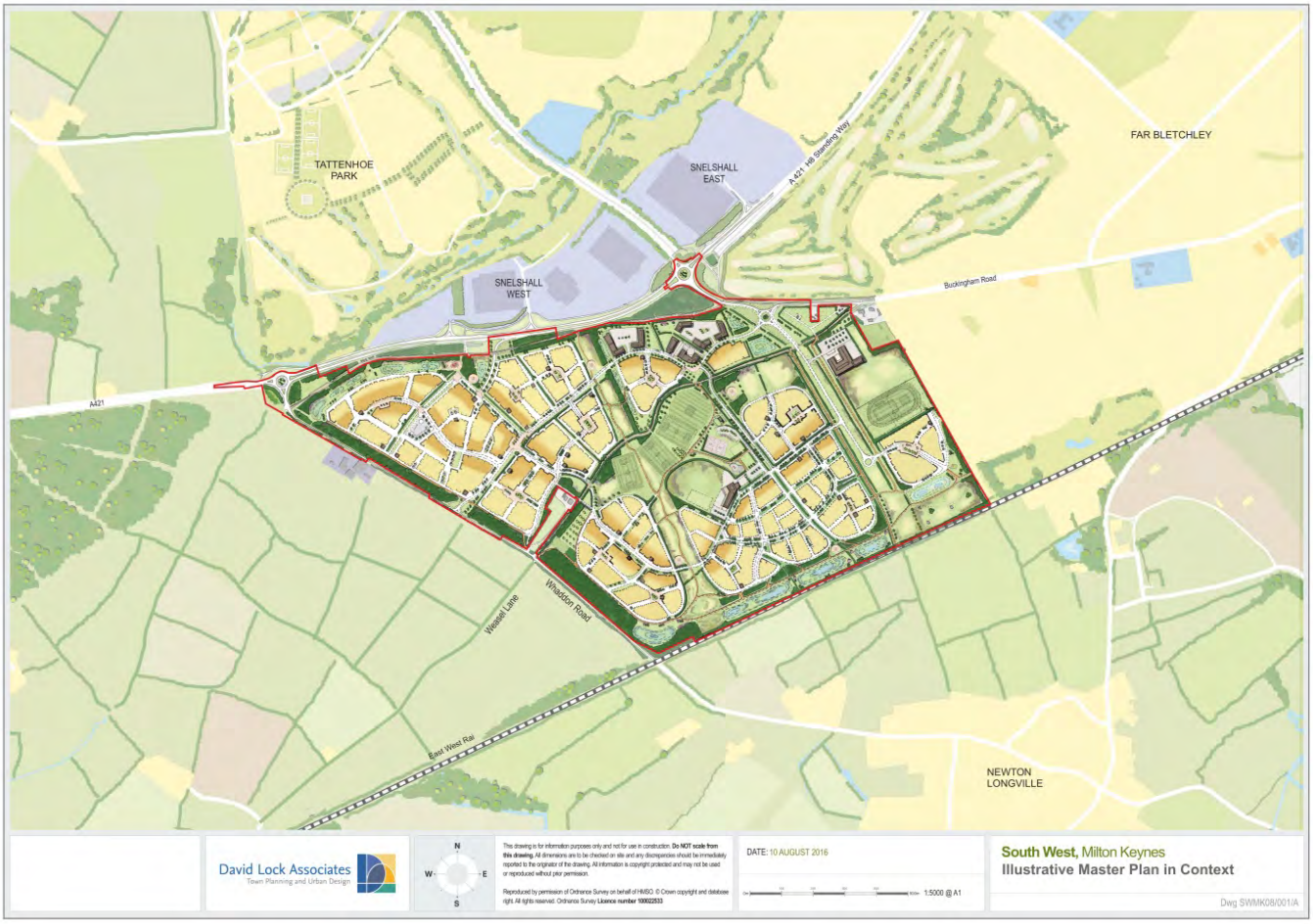


Table 14 to be inserted in MM158

Table 14 Types of older people accommodation

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

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

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

New policy H6b to be inserted in MM159

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

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

Table 15 Older person C2 accommodation allocations

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

2. The following broad locations are identified as containing suitable sites for the provision of C2 accommodation for older people between 2025 and 2033:
    a. Aylesbury town centre e.g. former HSBC bank, Walton Grove
    b. Aylesbury key employment sites e.g. Gatehouse Employment Area, Gatehouse Way
    c. Aylesbury other employment sites e.g. adjacent to Berryfields Neighbourhood Centre
    d. Suitable housing or employment sites identified in the HELAA

3. Proposals for C2 older people accommodation will be granted permission provided the following criteria are met:
    a. The proposal is in a sustainable location for amenities and services
    b. There is an identified package of care provision on site
    c. Minimum Clinical Commissioning Group inspected space standards are met or exceeded

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

Table to be inserted in Modification MM210

Table 17 Protected and supported transport schemes

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

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

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

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

Table to be inserted in Modification MM212

Table 18 BCC guidelines for Transport Assessment thresholds

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

Table to be inserted in modification MM217

Table 19 Electric Vehicle charging requirements

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

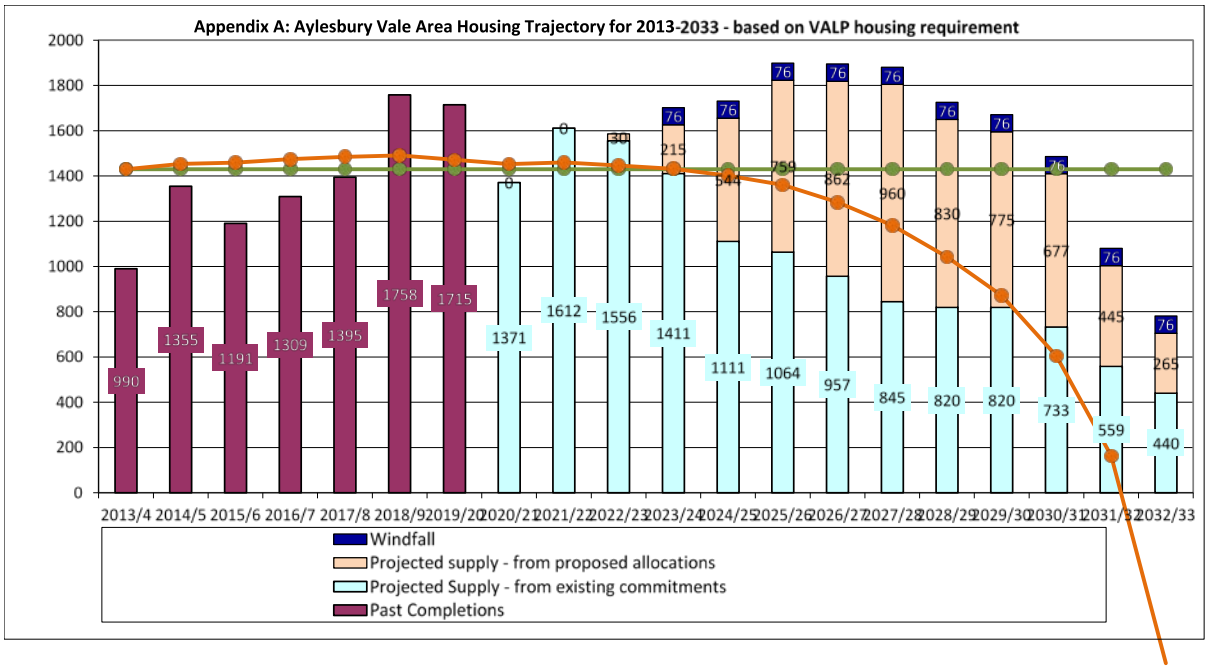
Appendix A referred to in Modifications MMs23 and 277

Table 1: Housing trajectory overview table

	2013/4	**2014/5**	**2015/6**	**2016/7**	**2017/8**	**2018/9**	**2019/20**	**2020/1**	**2021/2**	**2022/3**	**2023/4**	**2024/5**	**2025/6**	**2026/7**	**2027/8**	**2028/9**	**2029/30**	**2030/31**	**2031/32**	**2032/33**	TOTAL
Past Completions	990	1355	1191	1309	1395	1758	1715														9713
Projected Supply - from existing commitments								1371	1612	1556	1411	1111	1064	957	845	820	820	733	559	440	13299
Projected supply - from proposed allocations								0	0	30	215	544	759	862	960	830	775	677	445	265	6362
Windfall											76	76	76	76	76	76	76	76	76	76	760
Total Past Completions	**990**	**1355**	**1191**	**1309**	**1395**	**1758**	**1715**														
Total Projected Completions								**1371**	**1612**	**1586**	**1702**	**1731**	**1899**	**1895**	**1881**	**1726**	**1671**	**1486**	**1080**	**781**	20421
VALP Target	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	**1430**	28600
VALP Target - Cumulative	**1430**	**2860**	**4290**	**5720**	**7150**	**8580**	**10010**	**11440**	**12870**	**14300**	**15730**	**17160**	**18590**	**20020**	**21450**	**22880**	**24310**	**25740**	**27170**	**28600**	
Cumulative Completions	990	2345	3536	4845	6240	7998	9713	11084	12696	14282	15984	17715	19614	21509	23390	25116	26787	28273	29353	30134	
Number dwellings above or below cumulative target	-440	-515	-754	-875	-910	-582	-297	-356	-174	-18	254	555	1024	1489	1940	2236	2477	2533	2183	1534	

	2013/4	2014/5	2015/6	2016/7	2017/8	2018/9	2019/20	2020/1	2021/2	2022/3	2023/4	2024/5	2025/6	2026/7	2027/8	2028/9	2029/30	2030/31	2031/32	2032/33	TOTAL
Annual requirement taking account of past/ projected completions	1430	1453	1459	1474	1485	1491	1472	1453	1460	1446	1432	1402	1361	1284	1182	1042	871	604	164	-753	

Chart 1: Housing trajectory diagram



Appendix B referred to in Modifications MM214 and MM278

1. Residential Car Parking Standards

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

Table 1 - Residential Car Parking Standards

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

Note

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

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

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

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

2. Non-residential car parking standards

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

Table 2 - Non-residential Car Parking Standards

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

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

Note

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

Additional guidance

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

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

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

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

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

Residential schools – to be assessed individually.

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

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

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

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

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

3. Cycle Parking Standards

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

Table 3 - Cycle Parking Standards

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

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

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

4. Motorcycle Parking Standards

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

Table 4 - Motorcycle Parking Standards

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

5. Blue Badge Parking

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

Table 5 – Blue Badge Parking Standards

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

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

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

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

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

6. Residential car parking size and design

Dimensions for car parking

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

Table 6 – Minimum car parking dimensions

Dimension	Minimum Size
Length	5.0m
Width	2.8m

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

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

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

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

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

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

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

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

Table 9 – Minimum in line parking dimensions

Dimension	Minimum Size
Length	6.0m
Width	3.0m

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

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

Garage provision and size

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

Table 10 – Minimum garage dimensions

Dimension	Minimum Size
Length	6.0m
Width	3.0m

7. Parking Courts

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

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

Appendix C referred to in MM279

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

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

C.3 If either of the following apply:

a) the proposed residential development site would be of insufficient size in itself to make the appropriate provision in accordance with the standards below; or

b) taking into account the accessibility/capacity of existing open space facilities and the circumstances of the surrounding area, the open space needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site,

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

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

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

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

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

C.7 To apply the standards the population figure is the existing population plus the number of people living on the proposed development.

Quantitative/Accessibility Standard

1. No person should live more than 300m from their area of natural green space of at least 2ha in size and that there should be at least 2ha of accessible natural green space per 1000 population

2. At least one accessible 20ha of accessible natural green space within 2km of peoples' homes

3. One accessible 100ha of accessible natural green space within 5km of peoples' homes

4. One accessible 500ha of accessible natural green space within 10km of peoples' homes

5. 1.4ha per 1000 population as incidental open space (a type of accessible natural green space that incorporates amenity/landscape planted areas, green corridors

6. 1.2ha per 1000 population as major open space (a type of accessible natural green space that incorporates parks, formal gardens and public open space)

Quality Standard

1. Contribute to the management, conservation and improvement of the landscape

2. Contribute to the protection , conservation and management of historic landscapes, archaeological and built heritage assets

3. Maintain and enhance biodiversity and ensure that development and its implementation results in a net gain of biodiversity as identified in Biodiversity Action Plan habitats and species plans

4. Deliver the enhancement of existing woodlands and create new woodlands and tree features

5. Create new recreational facilities, particularly those that present opportunities to link urban and countryside areas

6. Take account of an integrate with natural processes and systems

7. Be managed to provide cost-effective and multi-functional delivery and funded in urban areas to accommodate nature, wildlife, historic and cultural assets, economic benefits and provide for sport and recreation activities

8. Designed to high standards of sustainability to deliver social, economic and environmental benefits

9. Provide a focus for social inclusion, community cohesion and development and lifelong learning

Appendix D referred to in MM280

D.1 This appendix identifies the standards of provision for sports and recreation facilities and how they are to be applied to proposals for new development as required by Policy I2 of the VALP.

D.2 The starting point for calculating the requirement are the standards set out in the table below. The precise type of on-site provision that is required will depend on the nature and location of the proposal, the existing facilities in the surrounding area and the quantity/type of sports and recreation facilities needed in the area. This should be the subject of discussion/negotiation at the pre-application stage.

D.3 If either of the following apply

(a) the proposed residential development site would be of insufficient size in itself to make the appropriate provision in accordance with the standards below; or

(b) taking into account the accessibility/capacity of existing sport and recreation facilities and the circumstances of the surrounding area, the sports and recreation needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site,

then proposals will be acceptable if the developer has first entered into a planning obligation to make a financial or in-kind contribution towards meeting the identified sport and recreation needs of the proposed residential development off-site. The precise contribution/obligation will be negotiated on a case by case basis, a formula for calculation will be set out in the Open Space, Sports, Leisure and Cultural Facilities SPD.

D.4 Where appropriate, the council will seek to enter into a Section 106 agreement with the developer for the future management and maintenance of the sports and recreation facility provision, before granting planning permission.

D.5 To apply the standards the population figure is the existing population of the closest settlement plus the number of people living on the proposed development.

D.6 If development proposals are considered to be unviable when complying with the above requirements, open book financial analysis of proposed development will be expected. In accepted circumstances, a reduced provision can be made.

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

Typology	Accessibility Standard	Quantitative Standard	Qualitative Standard
Pools	Aylesbury Vale should be outside of a 20 minute travel time.	population. Provision should be accompanied by the necessary support facilities (changing, plant, reception etc.)	quality standard for indoor swimming pools and their associated facilities will be to meet the most *current (at time of provision) Sport England Design Guidance Swimming Pool Design recommendations for a public use facility*.
Community Centres and Village Halls	See cell in 'Quantitative Standard' column for combined accessibility and quantitative standards	No provision required at Hamlet or Rural Parish 1 level; At Rural Parish 2 level a small community centre with main hall up to100m^2 with foyer, small meeting room, adequate storage, kitchen, toilet facilities and parking; At Rural Parish 3 level a medium sized community centre up to 250m^2, as above with addition of meeting room(s), and stage; At cluster and Larger Sustainable Settlement level a minimum 18m x 10m main hall and ancillary facilities suitable for sporting activities to standards set in Sport England Design Guidance Note *Village and Community Halls* plus small fitness room to relevant Sport England guidance; and a minimum 18m x 10m main hall with fixed or demountable stage and ancillary facilities suitable for arts and performance activities to standards set in Sport England Design Guidance Note *Village and Community Halls*. These two halls may in practice be the same if either meets the other's specification. For the Aylesbury and Buckingham Strategic Settlements, and in proximity to Milton Keynes (North East Aylesbury Vale) , no part of the settlement should be further than one mile from a community centre. The quantitative standard is one centre per 5,300	The minimum acceptable quality standard for community centres will be to meet the most *current (at time of provision) Sport England Design Guidance recommendations for these facilities*, accepting that the facility mix may not be directly the same as the Guidance, together with such environmental standards relating to sustainability, energy consumption and recycling, and building construction as required by the Council at the time of provision.

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

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

Appendix E referred to in MM281

1. SPD1 – Aylesbury Garden Town Framework and Infrastructure SPD

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

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

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

3. SPD 3 – RAF Halton (D-HAL003) SPD

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

4. SPD 4 - Affordable Housing SPD

   To provide detailed guidance and operation of Policy H1.

5. SPD 5 – Aylesbury Vale Design SPD

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

6. SPD 6 – Buckinghamshire Biodiversity Accounting SPD

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

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

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

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

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

Appendix F referred to in MM282

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

AVDLP Saved Policies	VALP Replacement Policies	Commentary
GP66 Access corridors and buffers adjacent to watercourses	NE2 Rivers and stream corridors	
GP69 Hotel and motel development	E7 Tourism Development and E8 Tourism accommodation	
GP70 Changes of use of rural buildings and historic buildings to hotel use	E7 Tourism Development and BE1 Heritage assets	
GP71 Bed and breakfast and guesthouse development	E8Tourism accommodation	
GP72 Proposals for self-catering holiday accommodation and holiday homes	E8Tourism accommodation	
GP73 Proposals for camping and touring caravan sites	E8Tourism accommodation	
GP77 Horse-related development	C2 Equestrian development	
GP78 Stables, loose boxes and other buildings for horses	C2 Equestrian development	
GP79 Proposals for noisy sports	NE5 Pollution, air quality and contaminated land	
GP80 The Wendover Arm of the Grand Union Canal Saved	C4 Protection of public rights of way	
GP81 Development of canal-related facilities	NE4 Landscape character and locally important landscape	
GP84 Public rights of way	C4 Protection of public rights of way and T7 Footpaths and cycle routes	
GP86 Provision of outdoor playing space	I1 Green infrastructure	
GP87 Application of open space policies Saved	I2 Sports and recreation	
GP88 Payment in lieu of providing sports and play areas	I2 Sports and recreation	
GP90 Provision of indoor sports facilities	I2 Sports and recreation	
GP91 Provision of amenity areas Saved	I1 Green infrastructure	
GP92 Safeguarding of allotment land	I1 Green infrastructure	
GP93 Safeguarding of community buildings and facilities	I3 Community facilities and assets of community value	
GP94 Provision of community facilities and services	I3 Community facilities and assets of community value	
GP95 Unneighbourly uses	BE3 Protection of the Amenity of Residents and NE5 Pollution,	

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

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

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

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

INSIGHT
SEPTEMBER 2024

Start to Finish

How quickly do large-scale housing sites deliver?

THIRD EDITION - POST 2024 ELECTION AND NPPF CONSULTATION 2024



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Some minor amendments have been made to the data since the March 2024 published version.

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Executive summary

This is the third edition of Start to Finish. The purpose of this research remains to help inform the planning system and policy makers in considering the approach to planning for new homes. The empirical evidence we produced in the first two versions has informed numerous local plan examinations, S.78 inquiries and five-year land supply statements.

Things have moved on notably since the second edition in 2020. Plan making and decision taking have slowed, the housing market no longer benefits from Help to Buy or cheap mortgage rates and the perennial concern about perceived land banking has been comprehensively rebutted by the Competition and Markets Authority (CMA). In addition, a recently-elected Labour government with a substantial majority is has committed to the delivery 1.5m homes within the current parliamentary term. Less than a month after taking office it has launched a consultation on changes to the National Planning Policy Framework[1] and a new standard methodology for assessing local housing need. It is therefore timely to refresh the evidence on the delivery of large-scale housing sites. Our enlarged sample now considers the real-world implementation across 179 sites of over 500 dwellings.

We draw six key conclusions:

1. **Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period (or parliamentary term) from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.** By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 to 1.6 years to deliver the first dwelling.
2. **Mean annual build-out rates on large sites have dipped slightly for all site sizes compared to previous editions of this research but are broadly comparable.** The slight dip may capture characteristics of newly-surveyed sites, but also extra monitoring years since 2019 that reflect market changes, including COVID impacts.
3. **Tough market conditions mean a likely slowing in build-out rates and house building overall.** The impact of the Help to Buy programme ending and higher mortgage rates is not yet showing in completions data, but the effect on transactions has already been significant and the OBR forecast they will fall further in 2024/25.
4. **Demand is a key driver of build-out rates.** The absorption rate of the local housing market dictates the number of homes a builder will sell at a level that is consistent with the price they paid for the land. Areas with a higher demand for housing (measured by higher affordability ratios, of house prices to earnings) had higher average annual build-out rates than lower demand areas.
5. **Variety (of housing type and tenure) is the spice of life.** Schemes with 30% or more affordable housing had faster average annual build-out rates than schemes with a lower percentage, but schemes with no affordable housing at all delivered at a faster pace than schemes with 10 to 29% affordable units. Having additional outlets on site also has a positive impact on build-out rates.
6. **Large-scale entirely apartment schemes can achieve significant annual build-out rates, but delivery is not always consistent, with 'lumpy' delivery of blocks of apartments and a higher susceptibility to market downturns and other development constraints.** These schemes can also have protracted planning to delivery periods compared to conventional housing schemes of the same size.

[1] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system

Key figures

297 sites assessed, with a combined yield of 387k+ dwellings; 179 of the sites delivering 500+ dwellings

9 solely apartment schemes in urban areas assessed, with a combined yield of 5,300+ units

6.6 mean years from validation of the first planning application to the first dwelling being completed on schemes of 2,000 or more dwellings

100-188 dpa average annual build-out rate range for schemes of 2,000+ dwellings[2]

44-83 dpa average annual build-out rate range for scheme of 500-999 dwellings[3]

34% quicker[4] to deliver greenfield sites of 500 or more units than their brownfield counterparts

69 dpa mean completion per outlet on sites with one outlet, dropping to 62 dpa for two outlets, and 55 dpa for three outlets

3x longer planning to delivery periods for brownfield apartment schemes of 500-999 units compared to their conventional housing counterparts

[2] Range is from the lower quartile to upper quartile figures

[3] As above

[4] This is based on the median metric

01
Introduction

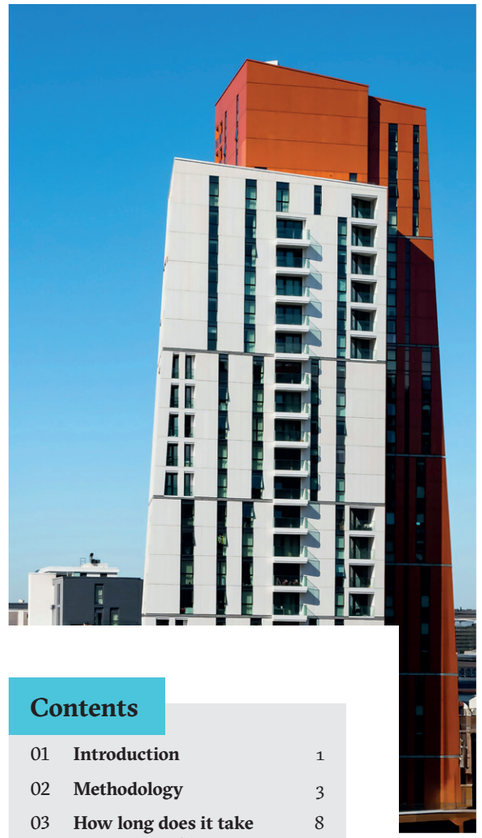
This is the third edition of Lichfields' award winning[5] research on the build out of large-scale residential development sites.

First published in 2016 and then updated in 2020, the report is established as an authoritative evidence base for considering housing delivery in the context of planning decisions, local plans and public policy debates.

In this update, we have expanded the sample size (with an extra 82 large sites delivering 500 or more dwellings, taking our total to 179 large sites, equivalent to over 365,000 dwellings). Small sites data has also been updated with 118 examples totalling over 22,000 dwellings in this third edition. We have used the latest monitoring data[6] where available, up to 1st April 2023.

The context for considering the delivery of development sites has evolved since our last edition and this has shaped the focus of our analysis.

In 2020 a recently re-elected Conservative government was gearing up for radical planning reform[7] including proposals aimed at boosting rates of on-site delivery following Sir Oliver Letwin's independent review of build out[8]. As of February 2024[9], the Competition and Markets Authority (CMA) freshly examined allegations of perceived 'land banking' and found that this is a symptom of the planning system rather than a cause of under delivery of housing. We have cross referenced our latest findings with the CMA's work.



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[5] The first edition was the winner of the 2017 RTPI Planning Consultancy Research Award

[6] Some sites have not been updated due to lack of publicly available data. The appendices make clear to which sites this relates

[7] Leading in due course to the August 2020 Planning White Paper: Planning for the Future

[8] Published October 2018

[9] https://assets.publishing.service.gov.uk/media/65d8baed6efa8300ldddcc5cd/Housebuilding_market_study_final_report.pdf

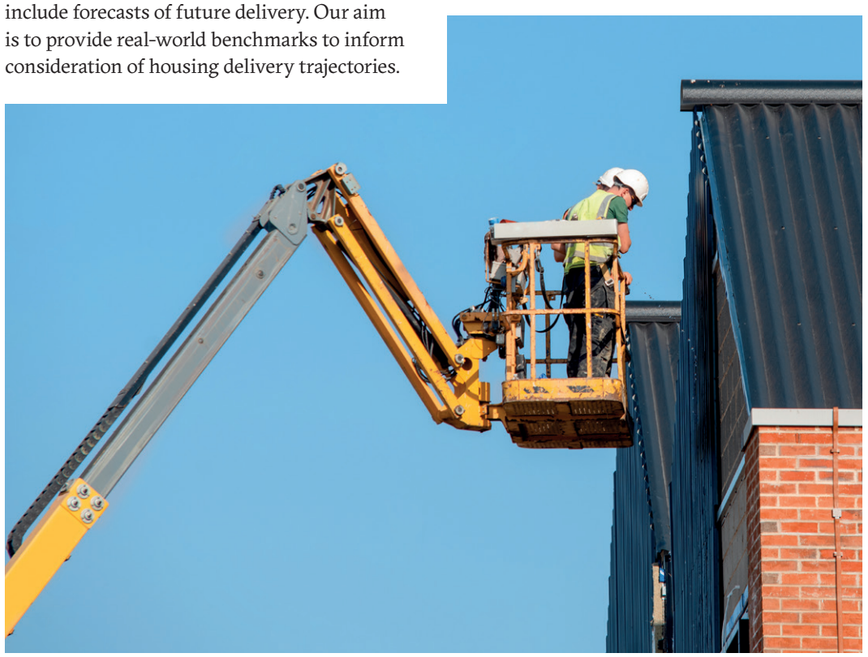
We now have radical political change nationally. A new Labour government swept to power in July 2024 off the back of a manifesto[10] seeking to deliver 1.5m homes in its first parliamentary term, including through the delivery of a new generation of new towns[11]. Less than a month after taking power the National Planning Policy Framework (NPPF) consultation was also launched with the expressed objective to *"get Britain building again"*[12]. As part of this consultation, the proposed new standard methodology to the assessment of local housing need has significantly increased the level of housing that should be planned for in many local authorities, with the total housing need figure nationwide increasing form 305,000 under the current approach to over 375,000. This research gives clear evidence to demonstrate if, and how, these figures might possibly be achieved in the context of strategic scale housing delivery examples.

Our research continues to focus exclusively on what has happened on the ground, how long things took and what has been built. We do not include forecasts of future delivery. Our aim is to provide real-world benchmarks to inform consideration of housing delivery trajectories.

This can be particularly relevant in locations with few contemporary examples of strategic-scale development. It also provides some context for when Government considers the recommendations of the CMA.

The research excludes London because of the distinctive characteristics of housing development in the capital. However, our sample does include apartment schemes on brownfield land in regional urban centres. These are particularly useful in the context that the NPPF consultation (2024) takes a *"brownfield first approach"*.

Finally, the housing market has taken a turn. In 2020, net housing additions in England peaked at 248,500. But in 2024, the market has stuttered with downward pressures on values and sales rates: Help to Buy closed in March 2023, mortgage rates more than doubled in 2022 and remain high and Registered Providers face challenges that limit their ability to invest in new stock. Our report considers how these headwinds may affect annual build-out rates.



[10] https://labour.org.uk/change/kickstart-economic-growth/#get-britain-building-again

[11] https://www.gov.uk/government/news/expert-taskforce-to-spearhead-a-new-generation-of-new-towns

[12] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system

INSIGHT
START TO FINISH

02
Methodology

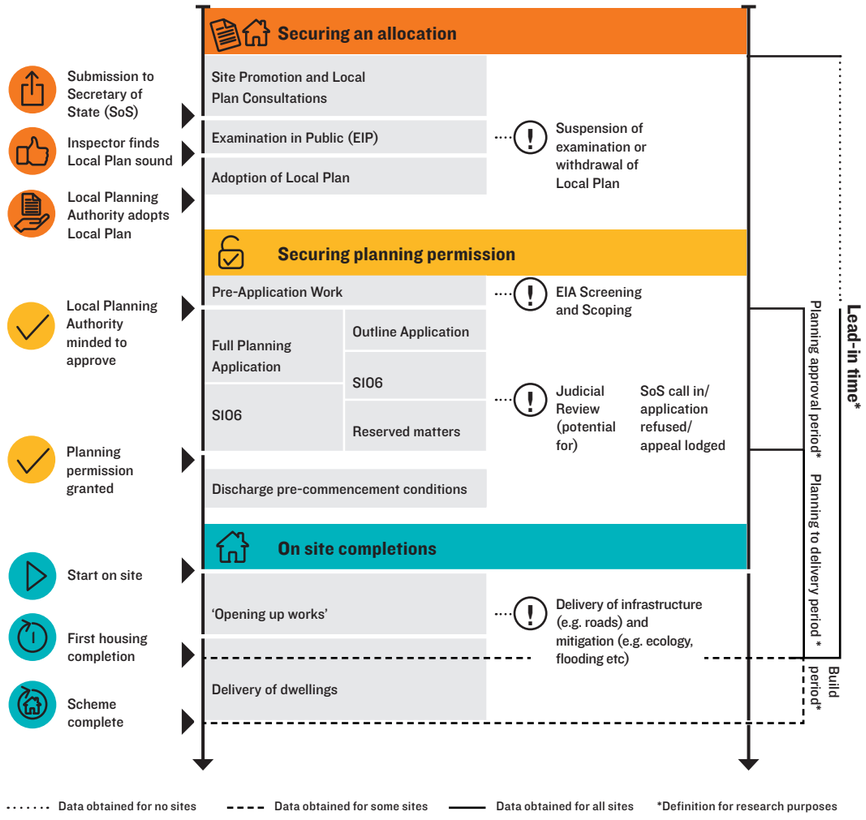
This report focuses analysis on the pace at which large-scale housing sites of 500 dwellings or more emerge through the planning system and how quickly they are built out. It identifies the factors which lead to faster or slower rates of delivery, including those impacting specifically on apartment schemes on brownfield sites in urban areas.

Definitions

For all sites, we look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the development stages have been codified as illustrated in Figure 2.1, which remain unchanged from the previous editions of this research.

The overall 'lead-in time' covers stages associated with securing a local plan allocation, going through the 'planning approval period' and 'planning to delivery period', and ending when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time.

Figure 2.I: Timeline for the delivery of large-scale housing sites



Source: Lichfields analysis

Lead-in time

Securing a development plan allocation is an important stage in the delivery of most large-scale housing sites. However, it is not possible to obtain information on a consistent basis for this process – which can often take decades across multiple plan cycles – and so we have not incorporated it in our analysis. For the purposes of this research the lead-in time reflects only the time from the start of the planning approval period up to the first housing completion.

Planning approval period

The 'planning approval period' begins with the validation date of the first planning application on the site (usually an outline application but sometimes hybrid or full) and extends until the date of the first detailed approval for dwellings on the site (either full, hybrid or reserved matters applications). It is worth noting that applications are typically preceded by significant amounts of (so-called) 'pre-app' engagement and evidence work, but due to a lack of data on these matters, it is not possible to establish a reliable estimate of the time taken on these activities (including through the local plan and pre-application). But the time taken to achieve an implementable planning permission will be markedly longer than we have identified in this study because work inevitably begins prior to the date the planning application is validated.

Planning to delivery period

The 'planning to delivery period' follows the planning approval period and measures the time from the date of the first detailed permission for construction of homes (usually reserved matters but could be a hybrid or full application) to the completion of the first dwelling. The use of the 'completion of the first dwelling' rather than 'works on site' reflects the availability of data: housing completions are routinely publicly recorded by LPAs but the commencement of work on site tends not to be. This allows for a consistent basis for measurement.

We can mostly only identify the monitoring year in which the completion took place, so the mid-point of the monitoring year has been used to calculate the end date of the planning to delivery period. For example, a scheme delivering its first unit in 2014/15 would be recorded as delivering its first unit on 1 October 2014.

For solely apartment schemes this will be slightly different as developers will typically complete an entire block on a single day. This will often mean the 'planning to delivery period' is longer as the first recorded completion for multiple apartments in a newly constructed multi-storey block would require more on-site work than required to complete a single house.



Build period

The annualised build-out rates are recorded for the development up to the latest year where data was available as of April 2023 (2022/23 in most cases). Not every site assessed will have completed its build period as many of the sites we considered had not delivered all dwellings permitted at the time of assessment; some have not delivered any dwellings.

We anticipate multi-phased apartment schemes will have more 'lumpy' completions data as entire blocks are recorded as having been completed on the same day. This could mean years with high delivery preceded and/or followed by more fallow years.

Detailed definitions of each of these stages can be found in Appendix 1.



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Development and data

Our analysis focuses on larger sites of 500 or more dwellings, but we have also considered data from smaller sites ranging from 50-499 dwellings for comparison and to identify trends. The geographic distribution of sites assessed is shown in Figure 2.2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to cover a range of locations and site sizes in the sample, but we cannot say it is representative of the housing market throughout England and Wales. Our conclusions may not be applicable in all areas or on all sites. Our sample size has increased significantly: we now have 179 large sites (the second edition had 97) and 118 small sites (the second edition had 83). We have endeavoured to include more recent examples to ensure that the latest trends in planning determination and build-out rates for housing sites are picked up proportionally through the analysis of housing sites of all sizes.

The sources on which we have relied to secure delivery data on all sites in this research include:

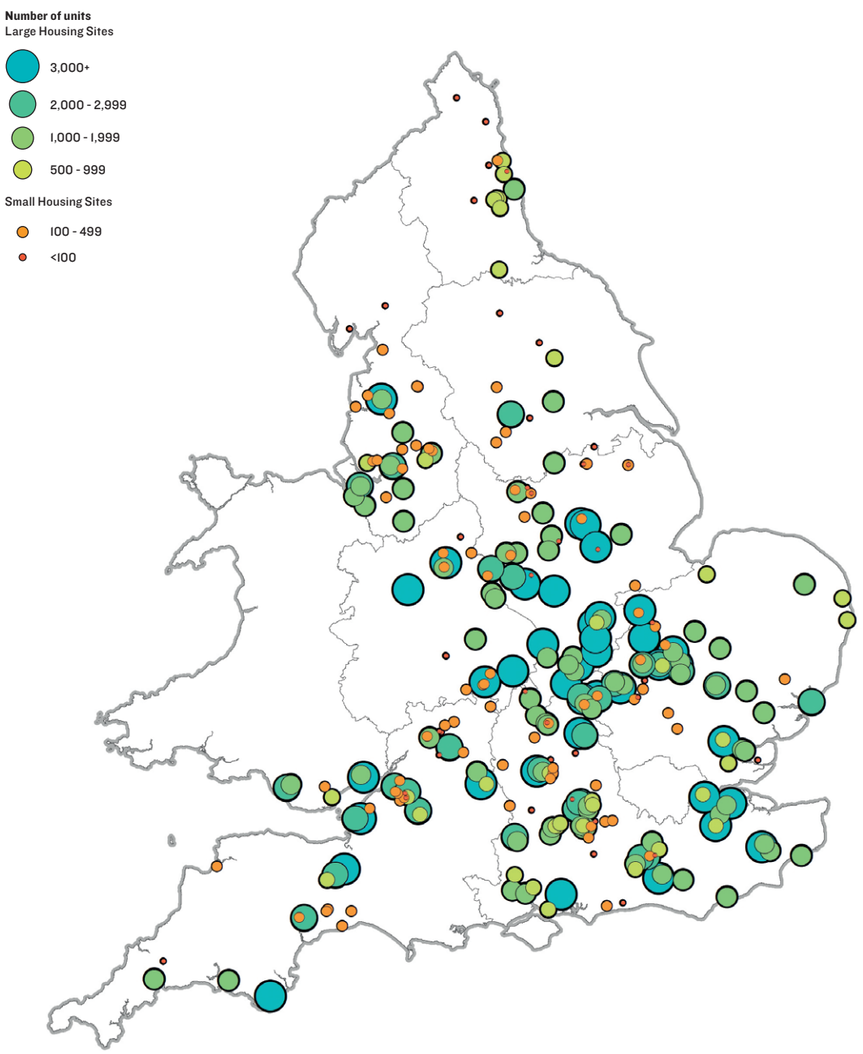
1. Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by LPAs[13];
2. Contacting the relevant LPA, and in some instances the relevant County Council, to validate or update the data; and
3. In a handful of instances obtaining/ confirming the information from the relevant house builders.



[13] Monitoring documents, five-year land supply reports, housing trajectories (some in land availably assessments), housing development reports and newsletters

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Figure 2.2: Map of sites assessed, by size of site (dwellings)



Source: Lichfields analysis

03
How long does it take to get started?

In this section we look at lead-in times; the time it takes for large housing sites to get planning permission and begin to deliver homes on site. This includes both the 'planning approval period' and the 'planning to delivery period'.

Planning approval period

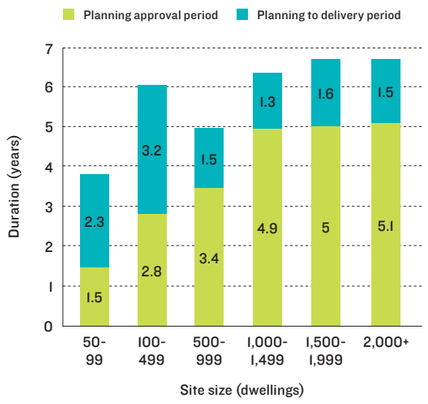
The first stage is the planning approval period: the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may refer to a single full/ hybrid application). Our data shows that the average (mean) planning approval period generally increases in accordance with site size; for small sites of less than 100 dwellings, this is on average 1.5 years, but for sites of 1,000 dwellings or more, it takes an average of five years to obtain detailed planning permission, with minimal change in this period as site size increases above this point.

Although it takes longer to achieve a detailed planning permission on larger sites, there is not a linear relationship between size of site and time taken to secure the detailed permission. This might be because the largest sites are more likely to be allocated in adopted local plans and so the principle of development would have already been established by the time an application is submitted. In theory this would help to speed up the planning approval process but end-to-end timescales are dependent on a timely local plan system.

In Wales, the restrictive policy towards speculative applications makes an allocation almost essential.

The CMA has also undertaken analysis of the time it takes land promoters and house builders to obtain outline planning permission. Using data obtained from land promoters, the CMA found that of the outline permissions obtained in 2022, 43.4% of them were obtained within five years or less, with 97.4% in nine years or less. These periods are significantly longer than the figures in our analysis because this includes pre-application promotion work, which is not captured in our data which starts with submission of the first application.

Figure 3.1 Average (mean) timeframes from validation of the first application to completion of the first dwelling



Source: Lichfields analysis

Table 3.1 Lower quartile, median and upper quartile timeframe from validation of the first application to completion of the first dwelling (years) by site size

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Lower Quartile	1.4	2.6	2.7	3.7	3.7	4.0
Median	2.7	5.2	4.0	5.4	5.3	6.3
Upper Quartile	5.9	9.0	6.6	8.3	6.9	7.9

Source: Lichfields analysis

The CMA go on to say in footnote 111 that *"in estimating the development timeline, our estimate for the most comparable element of the process is, on average, 3 to 4.5 years"*. This is more closely aligned to our findings on securing planning permission on a large site.

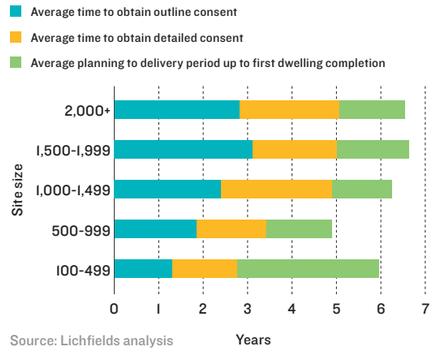
The CMA also found that the time required to make planning decisions is increasing (paragraph 4.27). However, its analysis considered developments of all sizes; we found no discernible difference in the time it takes schemes of 500 dwellings to achieve detailed approval since 2012/13 compared to older schemes. This could be because large-scale housing applications have always been more complex and so inevitably took longer to determine. They would, likely, also only be pursued by those with significant experience in this sphere. However, we did find an increase in the planning to delivery period which we discuss later in the report.

Outline permission to completion of the first dwelling

Our 2020 research was published in the aftermath of the February 2019 revisions to the NPPF which raised the bar on the definition of 'deliverable' for determining whether a site could be assumed to supply completions within the five-year housing land supply period. This definition is now well-established with the requirement for local planning authorities to provide 'clear evidence' to demonstrate the deliverability of sites that do not benefit from detailed permission.

We have updated our findings on the average time taken from gaining outline permission to the completion of the first dwelling on site, as shown in Figure 3.2. This indicates that it takes on average around 3 to 4.6 years from the grant of outline planning permission to deliver the first dwelling. This means at the time of its granting, an outline permission will deliver limited housing in a five-year period.

Figure 3.2 Overall lead-in times for sites of 100 dwellings or more including time taken for outline consent by site size



Source: Lichfields analysis

Planning approval period: What is going on?

Larger sites are often complex and require outline permissions to set the framework for future phases or staged delivery before bringing forward a detailed scheme through reserved matters and detailed permissions.

Outline planning permissions for strategic development are often not obtained by the company that builds the houses. Master developers and land promoters play a significant role in bringing forward large-scale sites that are subsequently implemented by house builders.

Promoters will typically obtain outline planning permission and then sell the site to a house builder that will secure the detailed approvals.

The CMA explains that land promoters are contractually obligated to begin the sale of land as soon as practically possible after receiving outline planning permission. The CMA found that whilst in 2022 65% of sites sold by promoters were sold within 12 months of obtaining planning permission, their data implied a large variation in the time taken to sell a site[14]. Reasons included low interest in the site, protracted price negotiations, withdrawal from a sale, and multi-phased sales.

[14] CMA Housebuilding Market Report paragraphs 4.53 and 4.66-4.69

1.6 years

time taken to build the first dwelling following detailed consent on a 1,500+ dwelling scheme

Planning to delivery period

Figure 3.1 demonstrates that smaller sites in this research take longer to deliver their first dwelling than large sites, measuring the time from detailed approval being secured. Sites of 500+ dwellings take 1.3 - 1.6 years to deliver the first dwelling. By contrast sites for 50 to 99 dwellings take 2.3 years, whilst sites of 100 - 499 dwellings takes 3.2 years.

Planning to delivery period: What is going on?

There are typically complex site-specific issues such as securing statutory approvals, signing-off details, resolving land ownership and legal hurdles prior to the commencement of development.

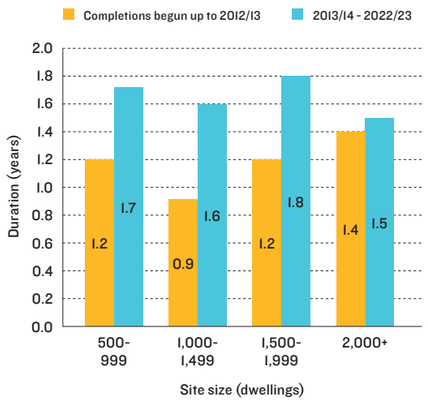
House builders must discharge pre-commencement planning conditions before constructing a home. These should be tailored to tackle specific problems but can be used broadly, for example relating to drainage, soil surveys, ecology, environmental health, materials samples, highways/ traffic plans and formalise any CIL liability.

Our 2021 research[15] provided a deep dive into five local authority case studies, using their monitoring data to look at what is happening to individual planning permissions at the local level once granted. Some permissions require re-working or replanning to improve a scheme. Often these reworks – undertaken at a point at which the principle of development has already been established – will help ensure the most efficient use of land and the right scheme for the market, while also reducing planning risk for the developer. Detailed permissions are more likely to be reworked, likely reflecting their relative inflexibility compared to outline permissions. The extent of re-plans reflects the limited scope to quickly amend permitted schemes without needing to submit a new application.

Planning to delivery period over time

The planning-to-delivery period is longer for sites of all sizes in the part of our sample that started in the last decade. Figure 3.3 splits the planning to delivery analysis in Figure 3.1 by time. It shows that up until 2012/13 (just after the NPPF was first introduced), the planning to delivery period ranged between 0.9 and 1.4 years, with schemes of 2,000+ dwellings taking the longest to get started. In the period since the NPPF replaced PPG/PPS3, the planning to delivery period has extended up to 1.5 to 1.8 years, a figure that is relatively consistent across all site sizes. The reasons for the change are not identified in the data, but may reflect the increased complexity of planning requirements as well as resourcing pressures in LPAs.

Figure 3.3 Planning to delivery period by site size



Source: Lichfields analysis

The overall lead-in time

The average time from validation of an outline application to the delivery of the first dwelling for large sites of 500 dwellings or more ranges from 4.9 to 6.6 years depending on site size, i.e. beyond an immediate five-year period for land supply calculations.

When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year (or parliamentary) period. Interestingly, sites of between 100 and 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 to 7 years, despite significant variation in site size.

After this period, an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4).



[15] Lichfields, 2021 Tracking Progress

04
How quickly do sites build out?

The rate at which homes are to be built on sites – and the realism of housing land supply and trajectories – is often contested at local plan examinations and planning inquiries where five-year housing land supply is a factor. The NPPF consultation (2024) seeks to reverse the December 2023 changes to the calculation of five year housing land supply and restore the requirements for LPAs to demonstrate this level of supply even when the adopted plan is less than five years old. In this context, a good understanding of real-world examples and evidence on absorption rates (see Section 5) remains essential.

Our analysis of build rate averages excludes any sites which have less than three years of completions data. This is because it is unlikely the completion figure in year one would cover a whole monitoring year, and so could distort the average for that site when considered alongside only one full year of completion data.

Some schemes do achieve very high rates of build-out in particular years (the top five annual figures were 520 to 620 dwellings per annum [dpa]) but this rate of delivery is not sustained (see Table 4.1). Apart from Ebbsfleet[16], the peak build-out rates were anomalous. That said, the five examples in Table 4.1 remain at the upper end of (or above) the range of our overall sample: for schemes of 2,000 or more dwellings the average annual completion rate throughout build-out ranges from 100 to 188 dpa (see Figure 4.1).

Table 4.1 Peak annual build-out rates compared against average annual build-out rates on these sites

Site	Local Planning Authority	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne (original new settlement[17])	South Cambridgeshire	3,300	620	188
Ebbsfleet	Dartford	15,000	619	255
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	562	251
Great Kneighton (Clay Farm)	Cambridge	2,188	539	219
Oakley Vale	North Northamptonshire	3,100	520	162

Source: Lichfields analysis

[16] Ebbsfleet has delivered a series of high annual buildout rates in the most recent five-year period: 2018/19 = 613, 2019/20 = 553, 2020/21 = 347, 2021/22 = 533 and 2022/23 = 619

[17] The second edition of this research included Cambourne as an example with a total site size of 4,343 dwellings. However, in this iteration we have separated out the sites into Cambourne the original new settlement (3,300 dwellings), Upper Cambourne (950 dwellings) and Cambourne West (2,350 dwellings)

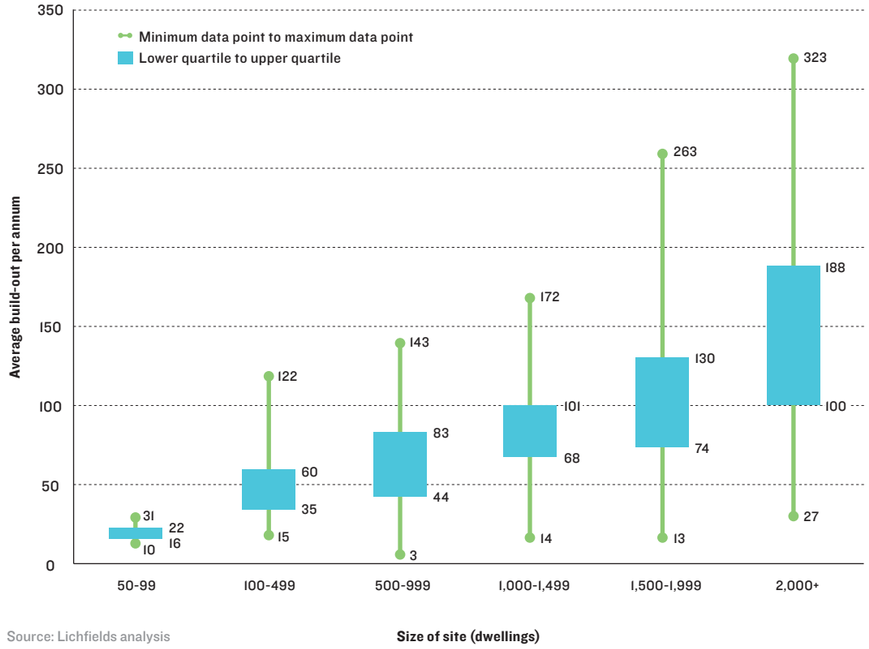
Average annual build-out rates

Figure 4.1 presents our updated results for average annual build-out rates by site size for all sites in our sample. Unsurprisingly, larger sites deliver on average more per year than smaller sites. Those of 2,000 dwellings or more, delivered on average more than twice the rate of sites of 500 - 999 dwellings.

In this third iteration of the research, we have identified the average (mean and median) build rate, but also the lower and upper quartiles to illustrate a range.

This avoids too much focus on a singular figure, recognising the wide range of factors that influence build-out rates as set out in Section 5. For sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. The highest average build-out rate in our analysis is 323 dpa, at Great Western Park, in the Vale of White Horse.

Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

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100-188 dpa

average annual build-out rate on 2,000+ dwelling scheme

Comparison with our previous editions

The number of sites we have assessed is significantly increased in this edition of the research, but particularly for the largest sites (2,000+ dwellings) where we have 43 extra examples. Over the three editions of our research, the mean build-out rate has decreased marginally, whilst the median rate is also lower for sites under 999 dwellings but broadly static for sites of 1,000 dwellings or more. Overall, there is limited difference in the average build-out rates across all three editions which gives us confidence in the findings. However, it does show there a reduction in the presented build-out rates overall. We explore whether this is a function of our sample size or the addition of new years of monitoring data in Section 5.

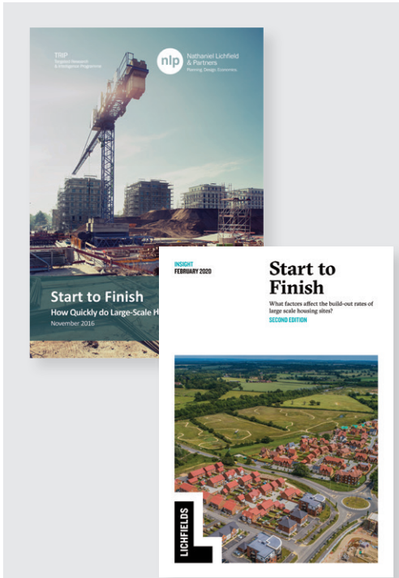


Table 4.2 Average build-out rates by size of site (dwellings) comparred with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	149		137	136	

Source: Lichfields analysis

05 What factors can influence build-out rates?

In this section we explore some of the factors that can influence the pace at which sites are built out. This includes site and location-specific factors, such as the strength of local market, the amount of affordable housing and whether a site is greenfield or brownfield. In this third edition, we also consider the potential impact of economic and housing market cycles.

Economy and market impacts

The housing market appears to be at the start of a new economic cycle. After around a decade of generally favourable market conditions (with cheap finance and policy support) potential home purchasers and builders are facing different circumstances.

Figure 5.1 looks at how average build-out rates on our sampled sites have correlated with net additional dwellings in England and recent economic events and interventions over our study period.

Economic and policy context for house building and build-out rates

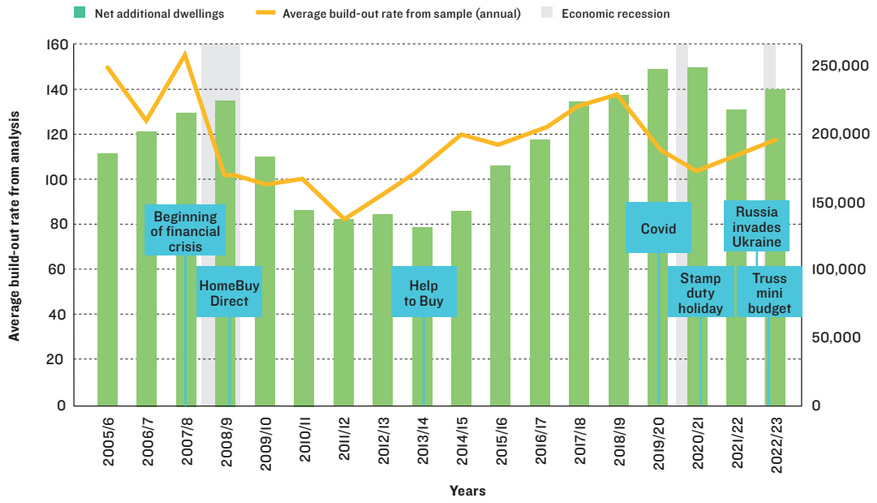
Government support for new home buyers was available before the Global Financial Crisis (GFC), (i.e. "First Buy" in 2006/7) but more robust support was introduced subsequently, firstly with Homebuy Direct, then Help to Buy which was introduced in 2013 and lasted until October 2022. It supported almost a third of new home sales over this period[18]. COVID-19 prompted a further stimulus in the form of a stamp duty holiday (July 2020 - July 2021).

Alongside these policy measures, mortgage rates were historically and consistently low, falling to 0.5% in March 2009 and 0.1% in March 2020 before rising again from December 2021.

Combined, this provided favourable conditions for home buyers and house builders.

The end of Help to Buy in 2022 was compounded by dramatically increased mortgage rates, reaching 5.25% in August 2023. The effect to transactions has already been significant and the OBR forecast (in March 2024) that transactions in 2024 will be 14% below pre-pandemic levels (2017-2019) and will not return to this level until 2027.

Figure 5.I: Net Additional Dwellings (England) and build-out rates (England and Wales) in economic context



Sources: Lichfields analysis of build-out rates, DLUHC 2024, Increase in Dwelling stock Table 104

[18] https://www.gov.uk/government/statistics/help-to-buy-equityloan-scheme-data-to-30-september-2021/help-to-buy-equity-loanscheme-data-to-30-september-2021#aboutthe-help-to-buy-equityloan-scheme

Looking ahead

The Bank of England estimates that (due to the increased share of fixed rate mortgages now being 85% compared to closer to 50% in 2007) *"over half the impact from two years of interest rate increases is still to be felt"*. This leads to the OBR forecasting a drop in housing transactions, and in housebuilding from an already low rate, to just 213,600 in 2025/26.

Worsening market conditions will likely markedly reduce build-out rates. Savills research for the LPDF 'A New Normal for Housebuilding' forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet, dropping from the 0.73 average homes sold per week between 2015 and 2021 (and 0.67 before the 2008 recession) to 0.5 - 0.6 over the medium term, taking into account the low and falling number of consented sites in developer pipelines, and the size of each site increasing. As we show (see Figure 5.6 later in this section), a lower number of outlets is correlated with slower build-out rates. The post-2022 conditions are yet to be fully captured in monitoring data, but we would expect this to arise in future years.

There is some room for optimism. The February 2024 RICS residential survey shows sales expectations improving over the next year and a positive sentiment for new instructions of sales for the first time in three years. This is likely at least partly due to a consensus that interest rates have peaked, with UK Finance forecasting mortgage affordability is plateauing, and will improve in 2025[19].

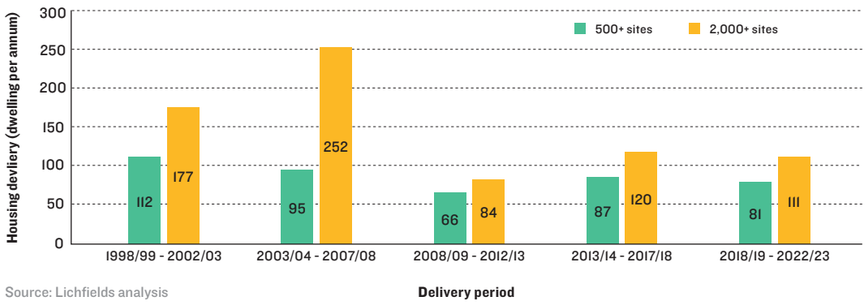
Looking back

The average build-out rates achieved on large sites (Figure 5.2) has fallen over time since before the GFC. The drop-off is most considerable for large sites starting development in the period directly after the GFC. Build out picked up slightly for projects that started in the five years to 2017/2018 taking in the impact of the 2012 NPPF. The COVID-19 pandemic and the rise in interest rates in the 2018/19 to 2022/23 period shows in the slight dip in build-out rate.

The largest sites (2,000+ dwellings) seem to have been hardest hit, falling from a peak average annual build-out of 252 dpa prior to the GFC to just 84 dpa during the recession and early recovery, before increasing again to 112 dpa in the most recent five-year period. However, the drop following 2007/8 may not be solely economically-driven; changes in the type of sites allocated, the structuring of delivery, and relying on s.106 for funding affordable housing and infrastructure may be determinative factors.



Figure 5.2: Average annual build-out rates for large sites (500 or more and 2,000 or more dwellings) by five-year interval



Source: Lichfields analysis

[19] https://www.ukfinance.org.uk/news-and-insight/press-release/mortgage-lending-fall-in-2024

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Site specific factors

Do homes get delivered faster in high pressure areas?

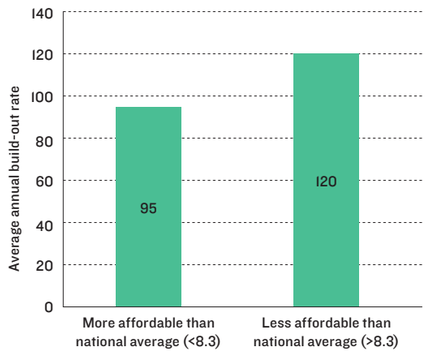
The rate at which homes can be sold (the 'absorption rate') determines the build-out rate. The CMA report found that there is strong evidence - from studies (including the second edition of this research) and engagement with stakeholders - that housebuilders (typically buying consented land using the residual land value method) generally respond to the incentive to sell at prevailing market value by building homes at a rate that is consistent with the local absorption rates. This avoids capital being tied up in partly finished or finished but unsold homes.

We have considered whether housing demand at the local authority level affects build-out rates. For the purposes of this research, higher demand areas are assumed to be those with a higher ratio of house prices to earnings, utilising the same measure as that applied in the Government's standard method for assessing local housing need. Figure 5.3 shows the sample of 500 or more dwelling schemes (that have delivered for at least three years) divided between whether they are located in a local authority above or below the national median affordability ratio (8.3). It shows higher demand areas appear to absorb 26% higher annual build-out rate than lower demand areas[20].

Of the five sites identified at Table 4.1 with the highest peak rates of delivery, all but Oakley Vale in North Northamptonshire are in local authority areas with workplace-based affordability ratios more than the national average when those rates were achieved[21].



Figure 5.3 Build-out rates by level of demand using national median 2022 workplace based affordbaility ratio (dpa)



Source: Lichfields analysis

26%

greater average annual build-out rate in higher demand areas

[20] This is in line with the findings of the second edition of the research, albeit both averages are lower this time. The previous research showed the large sites in LPAs which were 'more affordable than the national average (<8.72) delivered on average 99 dpa versus those large sites in LPAs which were 'less affordable than the national average (>8.72) at 126 dpa

[21] Using ONS long term affordability data https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022#:~:text=In%202022%2C%20full%2Dtime%20employees,6.2%20times%20their%20annual%20earnings

34%

greater annual average build-out rate on greenfield sites

Do sites on greenfield land deliver quicker?

Both previous editions of this research found that greenfield sites have, on average, delivered more quickly than brownfield sites. This remains the case in our updated cohort of sites. The median figures show greenfield sites delivering 34% higher average annual build-out rates. Using lower and upper quartiles to set a range, Figure 5.4 shows that brownfield sites are seen to deliver between 41 to 102 dpa compared with greenfield sites delivering 63 to 145 dpa. This is likely to reflect the fact that brownfield sites are more complex to deliver, can carry extra cost (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provisions, which as shown in Figure 5.5, can boost build-out rates. We consider issues related to apartment-led brownfield schemes in Section 6.

Housing mix and variety

The Letwin Review[22] posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build-out. It concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have tested this hypothesis by using affordable housing delivery percentages on site as a marker of a different tenure and the number of sales outlets on a site as a proxy for variety of product types.

Affordable housing

Large amounts of affordable housing on a site can boost delivery, if viable, because it taps into an additional source of demand. This is supported by our findings: schemes with the highest proportions of affordable housing (30%+) have the highest average annual build-out rates. However, there is not a direct correlation for those providing lower percentages; indeed, those providing 10- 19% affordable housing had the lowest average build-out rates whereas rates on schemes delivering the lowest levels of affordable housing (i.e. less than 10% and some providing zero) were on average higher than those providing 10-29% affordable homes.

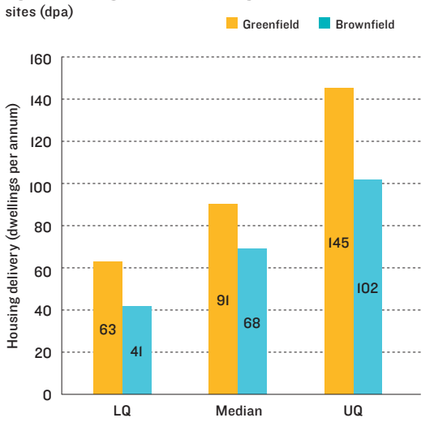
Whilst schemes with the highest rates of affordable housing achieve the highest rates, these are likely to be located in the strongest markets for homes to buy and there will, in most cases, be a cap on the proportion of affordable homes that can be achieved on sites without compromising overall viability.

Key worker housing

Among our sample of sites was a scheme delivering significant quantities of key worker housing. This specific type of housing was excluded from our wider research to avoid distorting the data.

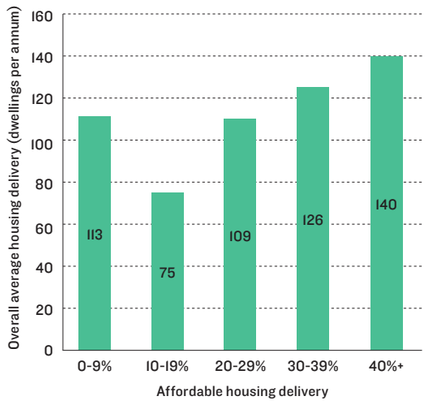
Delivery data obtained for North West Cambridge includes annual build-out rates by the University of Cambridge and Hill Residential (Table 5.1). This suggests a specific type of product may yield high annual build-out rates with the peak year of delivery reaching 409 dwellings. The average annual build-out rate for this site is 178 dpa which is significantly higher than other schemes in the 500-999 dwellings category. However, North West Cambridge also comprises apartments which have specific delivery circumstances which make them not be readily compared to the wider research. We consider urban apartment developments on brownfield sites in Section 6.

Figure 5.4 Average build-out rates on greenfield and brownfield sites (dpa)



Source: Lichfields analysis

Figure 5.5 Average build-out rates by level of affordable housing (dpa)



Source: Lichfields analysis

Table 5.1 Annual build-out rates at North West Cambridge by phase

North West Cambridge	2016/17	2017/18	2018/19	2019/20	2020/21	Average Build-out Rate
Lot 1 (University of Cambridge) KEY WORKER UNITS		117				
Lot 2 (University of Cambridge) KEY WORKER UNITS			264			
Lot 3 (University of Cambridge) KEY WORKER UNITS		232				
Lot 8 (University of Cambridge) KEY WORKER UNITS	73					
Lot M1 (University of Cambridge And Hill Residential)		3	109	7	2	
Lot M2 (University of Cambridge And Hill Residential)		1	36	15	33	
Totals	**73**	**353**	**409**	**22**	**35**	**178**

Source: Lichfields analysis

[22] https://www.gov.uk/government/publications/independent-review-ofbuild-out-final-report

Outlets

Across the years in which the number of outlets varied on the same site we have a total of 114 data points from 15 sites. The data is limited to those local authorities that publish information relating to outlets on site. It is a small sample, but larger than that available in our second edition (12 sites, and 80 data points).

We consider the number of outlets delivering dwellings each year. For example, if two phases are being built out in parallel by the same housebuilder this has been counted as one outlet with the assumption there is little variety (although some builders may in reality differentiate their products on the same site, particularly if dual branded). However, if two phases are being built out in parallel by different housebuilders this is counted as two outlets, with the assumption that there would be some variation in the product on offer.

Figure 5.6 shows a clear relationship between the number of outlets on site and the annual build-out rate achieved. Table 5.2 also shows that, although the quantum of completions in a year increases with every additional outlet, the average delivered per outlet increases slightly with four and five outlets.

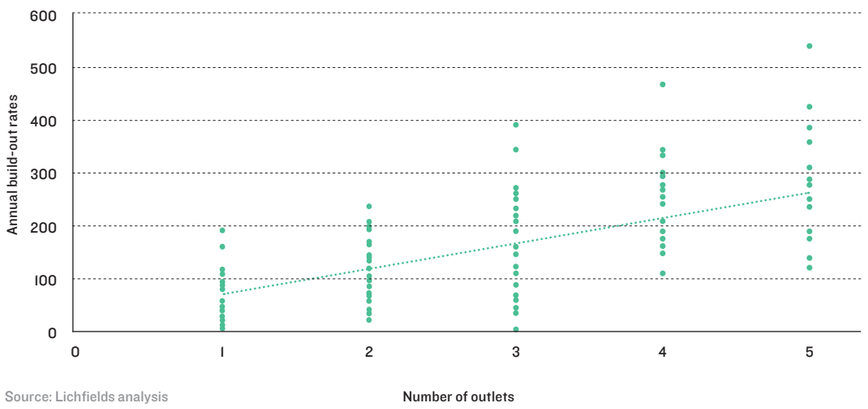
Table 5.2 Average annual completions per outlet

No of outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields analysis



Figure 5.6: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis

06
Delivery of brownfield, urban apartment schemes

The NPPF (2024) consultation is seeking to increase the emphasis on brownfield residential development through a brownfield-first approach and strengthens expectations that local plans should promote an uplift in density in urban areas. In all likelihood, more apartment schemes are likely to be a consequence of this policy approach. What contribution can these sites make to housing trajectories?

We have identified data for nine examples of solely apartment schemes in excess of 250 units on urban brownfield sites (all outside London). This is a reasonable number of units to differentiate sites from lower density suburban apartment developments that might appear in the research. These have been considered separately from the other large sites in the research and include no other types of dwelling (i.e. no townhouses, semis or detached properties). Some of the large sites analysis already considered will include apartments, potentially for significant proportions of their schemes, but they will also include some conventional houses.

Appendix 4 contains a short explanation of the planning history and build-out rates for each of the examples which have informed the analysis in this section. Their locations are shown on Figure 6.1.

Figure 6.1: Map of sites



Source: Lichfields analysis

Lead-in times

Whilst a modest sample size, it is immediately apparent that there is a significant extension in the time it takes for these sites to progress from planning to delivery (Table 6.1 and Figure 6.2).

When compared with comparably sized sites of conventional housing, our sample of apartment schemes have similar planning approval periods but then progressed to delivery much more slowly. This is particularly the case with the larger apartment schemes (500+ units) where the planning to delivery period for those considered was more than three times longer than the benchmarks for large conventional housing sites. For X1 Media City which is 1,100 units, it was more than seven times longer than conventional housing counterparts. Whilst one should be cautious drawing conclusions on a small sample, what might these findings imply?

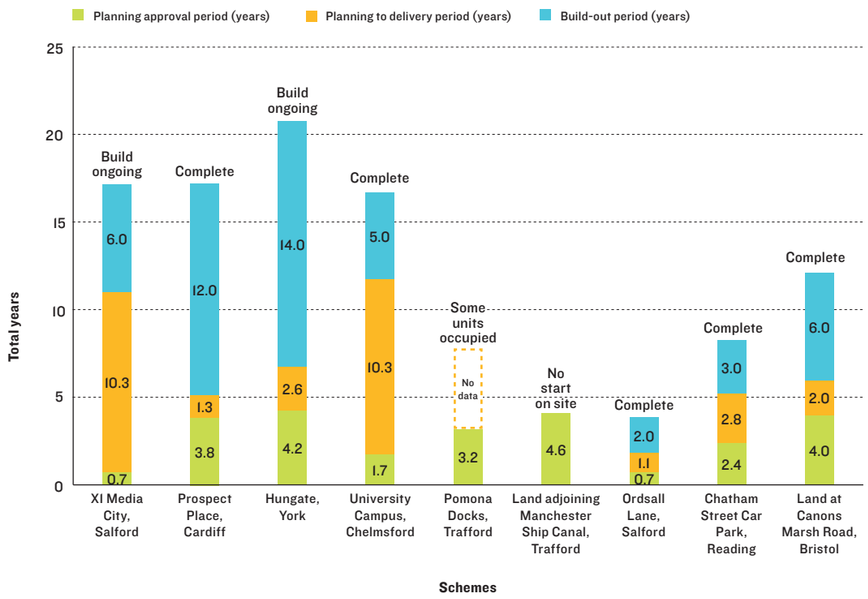
1. Firstly, when recording the completion of an apartment, this will be alongside others in one or more blocks that are completed in one go, rather than an individual dwelling that can be built and sold as the site progresses. Because it is likely to take longer to complete a block of apartments than a single house. As such, the period over which we are measuring planning to completion of the first apartment will likely be longer.
2. Secondly, as set out in Appendix 4, there can be considerable time spent in 'optimising' a planning permission once the 'original' detailed consent is granted. For example:
   - **X1 Media City**: This scheme was granted detailed consent in 2007. An extension of time application for the original consent was submitted in April 2010 and approved in November 2012. A further amendment to previously approved planning permission was approved in May 2016. First completions were recorded in 2017/18.
   - **University Campus (Chelmsford):** Outline planning permission was granted at appeal in October 2003. Following a public inquiry for Stopping Up Orders and their confirmation in October 2005, the site was sold in 2007. A further process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline and full application were approved in November 2012. First completions were recorded in 2014/15.
3. Thirdly, brownfield sites at scale can be complex with unusual issues to resolve. For example, Prospect Place (Cardiff) required extensive land reclamation. Further, the viability of delivering brownfield sites of this scale can be finely balanced with schemes susceptible to changes in the costs and values, necessitating redesigns prior to commencement of development.

Table 6.1 Lead-in time analysis for 9 example brownfield apartment schemes

	Site	Site Size (units)	Brownfield apartment schemes		Sites considered in sections 3 & 4	
			Planning approval period (years)	Planning to delivery period (years)	Planning approval period (years)	Planning to delivery period (years)
> 500 units	XI Media City, Salford	1,100	0.7	10.3	4.9	1.3
	Prospect Place, Cardiff	979	3.8	1.3	3.4	1.5
	Hungate, York	720	4.2	2.6		
	University Campus, Chelmsford	645	2.7	9.0		
	Pomona Docks, Manchester	526	3.2	Unknown		
	AVERAGE		**3.5**	**4.3**		
< 500 units	Land adjoining Manchester Ship Canal, Manchester	449	4.4	Unknown	2.8	3.2
	Ordsall Lane, Salford	394	0.7	1.1		
	Land at Canons Marsh Road, Bristol	307	4.0	2.0		
	Chatham Street Car Park, Reading	272	2.4	2.8		
	AVERAGE		**2.9**	**2.0**		

Source: Lichfields analysis

Figure 6.2: Lead-in time analysis for brownfield apartment schemes



Source: Lichfields analysis

Build-out rates

As explained, the nature of apartment schemes means that annual build-out rates can be lumpy, as homes delivered can only be recorded when a block is completed. Figure 6.3 shows Prospect Place, Hungate, University Campus Chelmsford and X1 Media City with years when many units were completed with subsequent fallow periods of no delivery. Table 6.2 further illustrates this by comparing the peak year of delivery with the average rate.

Apartment schemes may also be more susceptible to downturns in the market – the 'all or nothing' requirement (to complete whole blocks before units can be released to prospective purchasers) ties up capital and makes them higher risk for conventional sale. For example, LPAs told us that both Prospect Place and Hungate were significantly impacted by the GFC: each having more than five years in which there were no new completions.

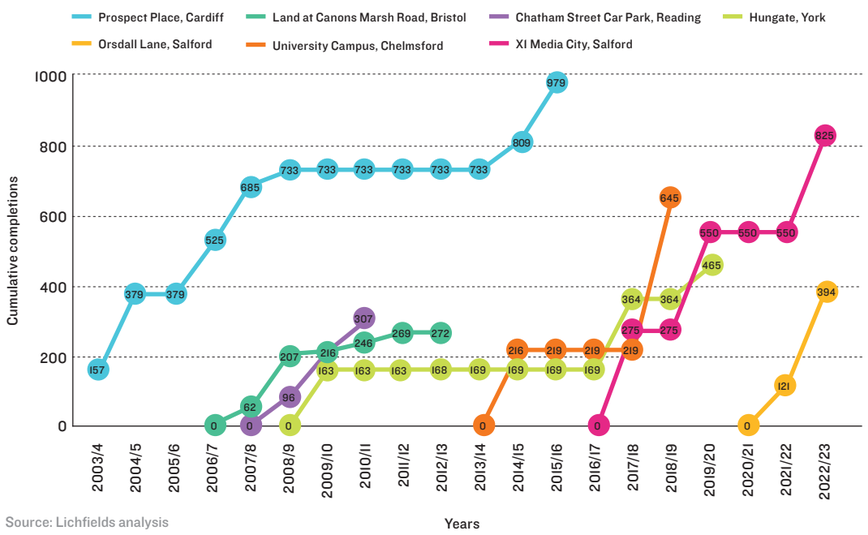
From our sample of nine sites, there is (perhaps unsurprisingly) much variety in the pace at which brownfield apartment schemes obtain planning permission (as there can be with greenfield sites), but more notable is how long it takes some sites to turn that consent into homes available for sale and occupation. Furthermore, while some significant 'peak' annual build-out rates can be achieved on these sites, delivery is lumpy and we found the GFC stalled completions on some schemes. Local authorities relying on higher density apartment schemes on brownfield sites to secure their five-year land supply or local plan housing trajectory will need to incorporate more flexibility if they are to be confident in achieving housing requirements.

Table 6.2 Peak annual build-out rates compared against average annual build-out rates on the example urban apartment schemes

Site	Average annual build-out	Peak years build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426
XI Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273

Source: Lichfields analysis

Figure 6.3: Annual build-out rates for the urban apartment scheme examples (years)



Source: Lichfields analysis

07 Conclusions

Our research provides real-world benchmarks to assist planning for the effective delivery of large-scale housing sites. These benchmarks can be particularly helpful in locations where there is limited experience of such developments to inform housing trajectories and land supply assessments. It augments the debate on build-out rates stimulated by the work of the CMA. We present some statistical averages to assist the debate, but the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and it is these – alongside the characteristics of individual sites – that need to be considered carefully by local authorities relying on these projects to deliver planned housing.

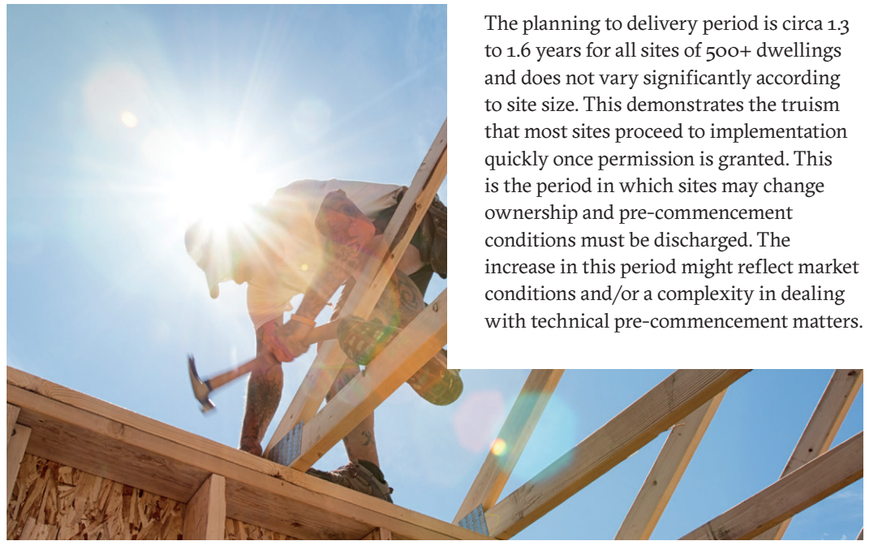
The averages presented in our analysis are not intended to be definitive or a substitute for a robust, bottom-up justification for the delivery trajectory of any given site factoring in local absorption rates. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different and the range in our lower and upper quartile figures for build-out rates illustrates the risk of relying on a singular estimate.

Key findings

1. **Only sites below 100 dwellings on average begin to deliver within a five-year period (or a parliamentary term) from validation of an outline application**

   When considering our updated data on lead-in times, it shows only smaller sites with 99 dwellings or fewer will typically deliver any homes within a five-year period (or parliamentary term) from the date that the first application is validated. In this research the lead-in time comprises the planning approval period and the planning to delivery period. Even small sites make a modest contribution within five years as the lead in time is on average 3.8 years. Larger sites of 1,000 dwellings or more on average take five years to obtain detailed planning permission (the planning approval period), meaning at the time the first application is validated, no homes from that site might be expected to be delivered in the forthcoming five-year period. This indicates if the new Labour government is going to delivery 1,5m homes in its first parliamentary term, approval for a significant number of schemes of less than 100 homes will be needed.

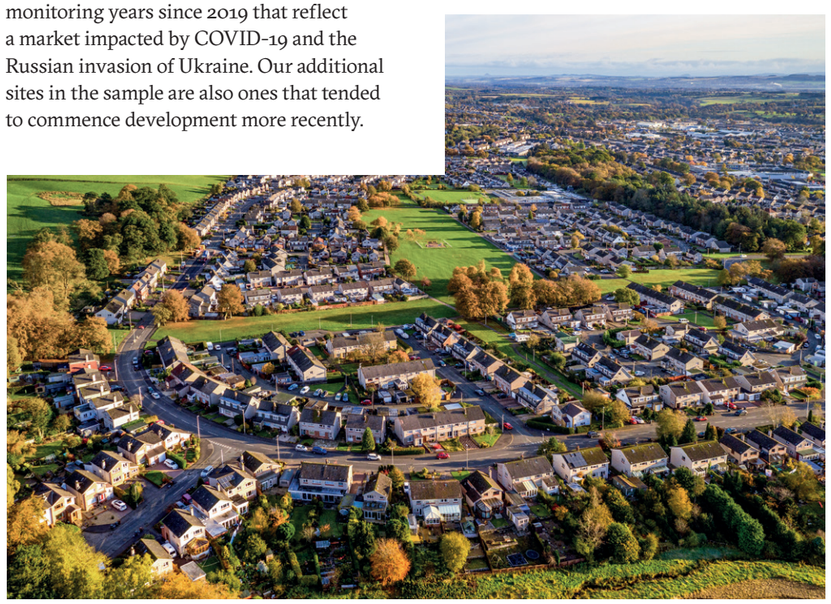
   The planning to delivery period is circa 1.3 to 1.6 years for all sites of 500+ dwellings and does not vary significantly according to site size. This demonstrates the truism that most sites proceed to implementation quickly once permission is granted. This is the period in which sites may change ownership and pre-commencement conditions must be discharged. The increase in this period might reflect market conditions and/or a complexity in dealing with technical pre-commencement matters.



2. Average annual build-out rates on large scale sites are lower than previous editions of this research

The build-out rates for schemes of 2,000 dwellings or more is 100 to 188 dpa using the lower and upper quartiles of our analysis. The lower and upper quartiles for every size of site category increase as they get larger. Bigger sites deliver more homes each year.

This third iteration of the research has increased our sample size, especially for the largest sites of 2,000+ dwellings (with 43 new examples). Whilst our findings remain comparable, the average rates of build out are slightly lower. The mean build-out rate has marginally decreased for every site size over the three editions of our research. For sites of 2,000+ dwellings the mean has decreased from 161 dpa to 149 dpa. For sites of under 1,000 homes, the median build-out rate is also lower decreasing from 73 dpa to 68 dpa for schemes of 500-999 dwellings. This may capture characteristics of newly surveyed sites, but also extra monitoring years since 2019 that reflect a market impacted by COVID-19 and the Russian invasion of Ukraine. Our additional sites in the sample are also ones that tended to commence development more recently.



3. Tough market conditions mean a likely slowing in build-out rates and house building overall

Market conditions have a clear effect on house building and the build-out rates of individual schemes. It is in this context that, ceterus paribus, one might expect to see a drop in build-out rates over the next few years. Recent research for the LPDF forecast fewer sales outlets (with fewer consented sites) and lower sales by outlet. Our research shows that a lower number of outlets is likely to lead to slower build-out rates.

There is some room for optimism with the February 2024 RICS residential survey showing sales expectations improving over the next year and for the first time in three years, a positive sentiment for new instructions of sales. This is likely at least partly due to a common belief that interest rates have peaked – reflected in the reduction in the base rate to 5% in July 2024 – and mortgage affordability will improve in 2025.

4. Demand is key to maximising build-out rates

The rate at which homes can be sold (the 'absorption rate') at a market value consistent with the price paid for the land determines the build-out rate. The CMA found there is strong evidence from studies and its own engagement with stakeholders, that housebuilders generally respond to the incentive to maximise prices by building homes at a rate that is consistent with the local absorption rates.

Our analysis found that areas with a higher ratio of house prices to earnings had an average 26% higher annual build-out rates on schemes of 500+ dwellings than lower demand areas. The top four highest individual years of delivery in this research (see Table 4.1) are in local authority areas with workplace-based affordability ratios greater than the national average at the time those build-out rates were achieved.

5. Variety is the spice of life

Additional outlets on site have a positive impact on build-out rates, although there is not a linear relationship. Schemes with most affordable housing (30% or more) built out faster, i.e. with higher average build-out rates than those with lower levels of affordable housing delivery; but those delivering between 10 and 19% of their units as affordable had the lowest build-out rates of all. One case study example – in Cambridge – was a predominantly key worker scheme that was able to deliver at an average of 178 dpa, significantly higher than other similar sized schemes included in this research. This points to the principle – identified by the Letwin Review – that, where there is a demand, a mix of homes, complementing market housing for sale, could have a positive impact on build rates.



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6. **Large-scale apartment schemes on brownfield land are less predictable forms of supply**

The largest apartment schemes delivered on brownfield sites appear susceptible to elongated planning-to-delivery periods compared to the benchmark averages for conventional houses on sites of similar scale. There can be protracted periods of redesign and site sale which means implementation can take longer. They can also be more susceptible to downturns in the market; two of the considered examples stalled after the financial crash of 2008.

Furthermore, the nature of apartment schemes – built in blocks rather than individual dwellings – also means that annualised build-out rates can be lumpy.

Combined, these factors mean any local authority relying on brownfield apartment developments to meet its housing needs, will likely need to incorporate flexibility in its approach when arriving at a realistic housing trajectory.



Looking forward

The CMA report states at paragraph 4.138:

"While we consider that measures to speed up the pace at which new build housing is supplied to the market may be beneficial (and we set out options for some in the chapter on addressing the problems we have found), these would need to be accompanied by planning reform if they were to deliver increases in housing delivery of the size needed to bring GB housing completions significantly closer to 300,000 per year."

The CMA concludes that achieving the necessary step-change in housing output is likely to be reliant on measures to improve the efficiency of the planning system: increasing the speed at which sites progress through the planning system, and then from planning to delivery; in increasing the number of sites granted planning permission for residential development; and increasing the pace and number of development plans being prepared and reviewed.

As set out earlier in this report, the new government is seeking to deliver 1.5m homes in their first parliamentary term, equivalent to 300,000 homes per year. In reality, any homes being delivered in the first year or two of this new parliamentary term will already have planning permission. This research shows us that the quickest planning to delivery period (i.e. from gaining detailed consent to building the first house) is 1.3 years. On the basis that this year has seen some of the lowest levels of housing consents for a decade[23], if anything close to 1.5m homes is to be delivered in the next five years, delivery well in excess of 300,000 homes a year will be necessary to make up for years one and two of the parliamentary terms. These homes can only be delivered by decisions made on planning applications almost immediately.

The publication of the draft NPPF consultation suggests the government understands planning applications will be key, not least through some developments in the Green Belt no longer being 'inappropriate' where certain criteria are met and updating 'the presumption'. It is possible that a more positive national policy environment for the delivery of housing, especially in the absence of a local plan, could speed up the planning approval period if, for example, fewer planning are appeals necessary. Only time will tell.

Whilst the slow moving local plan process will not yield results as quickly as immediate planning applications, the combination of a significantly increased standard method figure, the expectation to review Green Belt to meet housing needs, the pacey transitional arrangements proposed for plan making under the NPPF 2024 and potential updating of local plan intervention policy criteria means the Government is taking full local plan coverage seriously.

Even then, this research indicates that the largest strategic sites of 2,000+ homes would be unlikely to submit applications, determine them and build out homes in a five-year parliamentary term. As we know from the announcement of the Expert Taskforce for New Towns, they will not even report on the appropriate locations for new towns for a year[24].

In the current market, even with strong national policy backing, delivery of homes at rates not seen since the post war housing boom led by local authorities is a herculean task. To deliver anywhere close to 1.5m homes, sites of all sizes, but especially those of less than 100 homes, will need to be delivered at scale.

[23] HBF Housing Pipeline report https://www.hbf.co.uk/news/housing-pipeline-report-q4-2023-published-march-2024/

[24] https://www.gov.uk/government/news/expert-taskforce-to-spearhead-a-new-generation-of-new-towns

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Appendices

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Appendix 1: **Definitions and notes**

The ‘lead-in’

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time also includes the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The ‘planning approval period’

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwelling/s on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed ‘consent’ was considered reasonable and proportionate milestone for ‘planning’ in the context of this research. However, this need not be the detailed scheme which is built out. Many large-scale developments are re-designed over multiple iterations before work starts on site. This can be reflected in a protracted ‘planning to delivery period’.

The ‘planning to delivery period’

This includes any amended or extension of time planning applications, the discharge of any pre-commencement planning conditions and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the ‘first housing completion’

The month and year is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a midpoint of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The ‘annual build-out rate’

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMRs) and other planning evidence base documents produced by local authorities, contacting the LPA monitoring officers or planners where necessary and in a handful of instances obtaining the information from housebuilders.

Appendix 2: **Large sites tables**

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Ebbsfleet	Dartford	15,000	2009/10	127	79	55	50	44	40	60	141	312	613	553	347	533	619											
The Hamptons	Peterborough	6,320	1997/98	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	290.3	224	224	154	157	71	67	101	34	54	100	239	223	460	299
Houlton (Rugby Radio Station)	Rugby	6,200	2019/20	11	197	210																						
Land at Chilmington Green (South Ashford GC)	Ashford	5,750	2019/20	75	74																							
Sherford	South Hams	5,500	2016/17	7	130	142	151	113	108	183																		
Hanwood Park (East Kettering SUE)	North Northamptonshire	5,500	2016/17	29	124	132	179	103	230																			
North West Preston (MD2)	Preston	5,300	2015/16	57	250	297	411	307	266	372	359																	
Priors Hall	North Northamptonshire	5,200	2011/12	56	21	59	87	170	155	269	238	171	145	112														
Former Alconbury Airfield, Huntingdon	Huntingdonshire	5,000	2016/17	48	115	112	119	151	168	149																		
Wichelstowe	Swindon	4,500	2008/09	158	93	195	64	100	61	44	29	57	0	0	10													
Monkton Heathfield	Somerset West and Taunton	4,500	2012/13	22	76	220	191	222	145	84	49	89	67															
The Wixams	Bedford	4,500	2008/09	8	190	160	138	113	109	109	44	37	47	95	344	177	218	251										
Thorpebury (North East Leicester SUE)	Charnwood	4,500	2021/22	32																								
Whitehouse - Western Expansion Area	Milton Keynes	4,320	2015/16	21	124	270	297	341	151	141	134																	
Valley Park (Land to the west of Great Western Park)	Vale of White Horse	4,254	N/A																									
Broughton Gate & Brooklands (Eastern Expansion Area)	Milton Keynes	4,000	2008/09	154	359	371	114	473	138	144	305	239	242	187	309	254	158											
Glan Llyn (Former Llanwern Steelworks)	Newport	4,000	2011/12	10	35	112	76	127	75	124	154	67	55	190	171													
Locking Parklands	North Somerset	3,700	2011/12	23	45	97	75	10	21	86	57	53	153															
Stanton Cross	North Northamptonshire	3,650	2018/19	57	158	132	111																					
Beaulieu Park	Chelmsford	3,600	2015/16	40	110	262	200	195	164	211	236																	
Chatham Docks/ Waters	Medway	3,600	2021/22	199	193																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Overstone Leys (Northampton North SUE)	Daventry	3,500	2017/18	21	47	58	68	163	197																			
Northstowe Phase 2	South Cambridgeshire	3,500	2020/21	2	41																							
Long Marston Airfield	Stratford-upon-Avon	3,500	2021/22	77																								
South East Coalville (Land north and south of Grange Road)	North West Leicestershire	3,500	2018/19	4	63	124	272	207																				
Great Western Park	South Oxfordshire	3,364	2011/12	110	204	232	392	368	389	431	471	430	205															
Grantham North West Quadrant (Poplar Farm & Rectory Farm)	South Kesteven	3,350	2013/14	13	102	108	25	74	193	108	43	8																
Cambourne (original new settlement)	South Cambridgeshire	3,300	1999/00	42	180.5	180.5	213	337	620	151	378	268	219	191	161	206	154	151	128	239	201	96	126	87	32	61	93	
Lawley Village	Telford and Wrekin	3,300	2013/14	176	251	211	190	210	367	57	10																	
Berryfields Major Development Area (Aylesbury Garden Town)	Buckinghamshire	3,254	2010/11	22	164	273	321	562	378	350	265	340	191	107	136	158												
Land Around Fernwood	Newark and Sherwood	3,200	2019/20	3	53	87	141																					
Middlebeck (Land South of Newark)	Newark and Sherwood	3,150	2018/19	57	90	117	152	87																				
Oakley Vale	North Northamptonshire	3,100	2001/02	35	89	289	258	346	487	520	233	174	159	107	127	103	51	40	9	78	68	59	88	87				
Land North of Beaconside/Stafford	Stafford	3,100	2018/19	10	33	30	27	111																				
Burgess Hill Northern Arc	Mid Sussex	3,040	N/A																									
Kings Hill	Tonbridge and Malling	3,024	1996/97	140	140	140	140	140	126	219	104	237	166	281	300	224	93	55	90	84	108	91	74	41	31	27		
North West Cambridge	Cambridge	3,000	2016/17	73	353	409	22	35	0																			
West of Waterlooville	Havant	3,000	2009/10	38	71	30	82	112	135	196	241	193	194	181	91	109	93											
Lighthorne Heath, Kingston Grange	Stratford-upon-Avon	3,000	2019/20	13	34	219																						
Towcester Vale SUE (JCS Policy T3)	West Northamptonshire	3,000	2017/18	42	192	135	145	174	236																			
Cranbrook	East Devon	2,900	2012/13	187	419	356	299	214	241																			
Glebe Farm	Milton Keynes	2,900	2019/20	63	177	422	214																					

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Wintringham Park, St. Neots	Huntingdonshire	2,800	2019/20	4	46	81	191																					
West of Kempston	Bedford	2,760	2010/11	52	102	144	167	124	175	103	90	19	0	4	0	0												
Mowbray, North of Horsham	Horsham	2,750	N/A																									
South of the M4	Wokingham	2,605	2012/13	37	175	56	29	166	419	344	361	348	291															
Winterstoke Village, Western-super-Mare	North Somerset	2,550	2014/15	132	185	242	161	178	42	56																		
Emersons Green East	South Gloucestershire	2,550	2014/15	274	238	387	424	122	254	262	194	234																
Branston Locks	East Staffordshire	2,500	2018/19	3	33	84	138																					
Great Wilsey Park, Haverhill	West Suffolk	2,500	2022/23	90																								
Kilnwood Vale	Horsham	2,500	2013/14	75	76	131	51	53	196	74	199																	
City Fields	Wakefield	2,500	2017/18	59	92	125	200	298	336																			
South Wokingham	Wokingham	2,490	2013/14	6	104	120	135	118	71	28	0	54																
East Anton (Land East Icknield Way)	Test Valley	2,484	2009/10	184	257	103	181	135	229	146	184	162	239	279	242													
Kingsbrook (Aylesbury Garden Town)	Buckinghamshire	2,450	2016/17	92	219	181	204	184	235	201																		
North Wokingham	Wokingham	2,391	2010/11	28	99	23	0	95	112	66	154	232	273	165	296													
Cambourne West	South Cambridgeshire	2,350	2021/22	93																								
The Steadings (Chesterton Strategic Site)	Cotswold	2,350	2022/23	2																								
Broadlands	Bridgend	2,309	1999/00	288	331	307	193	204	156	64	104	91	28	81	50	147	11											
Western Riverside	Bath and North East Somerset	2,281	2011/12	59	147	93	61	163	154	45	52	52	0	0														
Arborfield Garrison	Wokingham	2,225	2016/17	57	114	116	268	348	336																			
Fairfields (Western Expansion Area)	Milton Keynes	2,220	2015/16	114	165	267	288	163	105	112	77																	
Charlton Hayes, Northfield	South Gloucestershire	2,200	2010/11	83	87	163	333	281	193	301	168	174	125	167	118	8												
Great Kneighton (Clay Farm)	Cambridge	2,188	2012/13	16	271	393	149	467	539	109	93	99	52															
Chapelford Urban Village	Warrington	2,144	2004/05	211	214	166	262	224	141	180	183	247	60	160	66	30												
Money Hill - Land north of Ashby de la Zouch	North West Leicestershire	2,050	2017/18	42	28	27	24	11	30																			
Land to the north east of Didcot	South Oxfordshire	2,030	N/A																									
Ledsham Garden Village	Cheshire West and Chester	2,000	2016/17	41	90	13	53	121	49																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
North Felixstowe Garden Neighbourhood	East Suffolk	2,000	2021/22	10	65																							
Comeytrowe / Trull	Somerset West and Taunton	2,000	2021/22	4																								
Graven Hill	Cherwell	1,900	2016/17	1	28	122	44	176																				
North East of Didcot	South Oxfordshire	1,880	2019/20	27	82																							
Elvetham Heath (Fleet)	Hart	1,869	2000/01	192	300	297	307	287	238	103	139	6																
Colethrop Farm (Hunts Grove)	Stroud	1,750	2010/11	2	87	106	80	58	7	2	22	112	127	209	122													
Great Denham	Bedford	1,750	2009/10	92	150	159	71	122	146	123	211	162	191	63	39	25	9											
Horwich Loco Works	Bolton	1,710	2018/19	3	33	45	30																					
Land at Berry Hill, Mansfield	Mansfield	1,700	2018/19	36	131	172	157	80																				
Tadpole Garden Village	Swindon	1,695	2014/15	27	161	400	215	448	328																			
Plymstock Quarry	Plymouth	1,684	2013/14	2	100	110	57	71	73	73	41	23	56															
Dickens Heath	Solihull	1,672	1997/98	2	179	196	191	207	88	124	64	249	174	16	96	110	4	0	0	13	10	26	12	96				
Red Lodge	West Suffolk	1,667	2004/05	65	93	181	79	57	79	61	101	213	101	78	23	75	111											
Melton Road, Edwalton	Rushcliffe	1,667	2016/17	40	126	271	144	140																				
Newton Leys	Milton Keynes	1,650	2014/15	223	140	154	88	134	148	103	102	76																
South West Bicester (Phase 1 Kingsmere)	Cherwell	1,631	2011/12	40	107	133	179	210	231	196	205	110	95															
Centenary Quay	Southampton	1,620	2011/12	102	58	103	137	257	8	110	76	16	87	0	161													
Chesterwell, North Colchester Urban Extension	Colchester	1,600	2015/16	150	150	150	150	150	56	59	90																	
Harworth Colliery - Simpson Park	Bassetlaw	1,600	2014/15	7	28	45	36	2	62	43	63	42																
Parc Derwen	Bridgend	1,577	2010/11	8	103	134	201	199	197	157	186	157	94	19	51													
Chesterfield Waterside, Brimington Road, Chesterfield	Chesterfield	1,550	2014/15	19	0	0	0	0	0	46	32	62																
Northumberland Park	North Tyneside	1,513	2003/04	54	194	171	93	179	100	69	117	96	53	82	64	86												
Horley North West Sector	Reigate and Banstead	1,510	2017/16	256	264	204	113	244	188																			
Jennet's Park, Peacock Lane	Bracknell Forest	1,500	2007/08	153	154	145	168	136	179	235	93	37	0	28	16	65	47	0	0									
Northstowe Phase 1	South Cambridgeshire	1,500	2016/17	13	140	278	243	256	178																			

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Sutton New Hall Farm	Cheshire West and Chester	1,500	2016/17	41	90	13	53	121	49																			
Burleyfields (part of the West of Stafford Strategic Development Location)	Stafford	1,500	2020/21	49	98	175																						
Hartland Park	Hart	1,500	2020/21	46	64	66																						
West Carclaze Eco-community	Cornwall	1,500	2021/22	11	60																							
Handley Chase - Sleaford South Quadrant	North Kesteven	1,450	2018/19	2	6	29	17	134*																				
Love's Farm, St Neots	Huntingdonshire	1,438	2007/08	34	186	336	302	216	60	108	59	85	49	3														
Rochester Riverside	Medway	1,400	2019/20	126	117	88	127																					
Park Prewett Hospital, Aldermaston Road, Basingstoke	Basingstoke and Deane	1,341	1998/99	58	82	37	102	0	0	0	0	0	307	214	219	146	33	34	56	7	30	16						
Northern Gateway (Airfields and former Corus site)	Flintshire	1,325	2020/21	112	135	36																						
Ashford Barracks (Repton Park)	Ashford	1,300	2005/06	83	0	124	14	64	58	155	103	49	70	67	138	90	163	29	71									
Kings Moat Garden Village	Cheshire West and Chester	1,300	2019/20	5	83	138																						
Bolnore Village	Mid Sussex	1,279	2000/01	10	66	61	244	159	168	52	99	15	0	0	0	53	68	68	86	61	51	18						
Kempshott Park	Basingstoke and Deane	1,252	2000/01	78	310	229	213	281	84	33	24																	
Blue Boar Lane	Broadland	1,233	2015/16	75	165	253	243	180	160	110	47																	
Picket Twenty	Test Valley	1,219	2011/12	147	178	180	176	164	145	175	96	155	169	124	38													
Holborough Quarry	Tonbridge and Malling	1,211	2006/07	85	137	91	47	18	100	59	12	43	64	60	101	61	78	47	1									
Staynor Hall	Selby	1,200	2005/06	1	69	170	28	45	57	53	42	111	90	84	65	46	31	22	15	25	13							
Trumpington Meadows	Cambridge	1,200	2011/12	2	137	141	67	105	89	123	148	72	128	48														
North Ely (Orchards Green)	East Cambridgeshire	1,200	2018/19	49	50	70	80																					
Winnington Urban Village	Cheshire West and Chester	1,200	2013/14	86	159	144	176	62	142	65	70	17																
Heyford Park (Former RAF Upper Heyford)	Cherwell	1,183	2014/15	46	166	106	103	97	58	76																		
Oxley Park (East & West)	Milton Keynes	1,159	2004/05	52	166	295	202	115	91	75	163																	
Icknield Port Loop	Birmingham	1,150	2019/20	40	175																							
North West Haverhill, Ann Suckling Road	West Suffolk	1,150	2020/21	89	40	80																						

*(+67 communal accommodation)

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Orchard Park, Cambridge	South Cambridgeshire	1,120	2006/07	100	290	148	103	95	56	34	16	75	39	30	2	42												
Velmead Farm, Fleet	Hart	1,112	1989/90	1	104	193	89	101	52	101	113	130	74	102	48	4												
Cheeseman's Green (Finberry)	Ashford	1,100	2014/15	59	47	102	157	181	19	48																		
Zones 3 to 6, Omega South	Warrington	1,100	2017/18	15	119	111	115	124																				
Llanwern Village	Newport	1,100	2019/20	31	74	39	52																					
Land at Kingsley Fields	Cheshire East	1,100	2018/19	49	151	125	177																					
Cottam Strategic Site (MDI)	Preston	1,100	2014/15	23	15	61	46	58	43	101	114	211																
Land north of Woodhall Business Park	Brentwood	1,100	2022/23	20																								
Bankside Phase 1, Banbury (Longford Park)	Cherwell	1,090	2014/15	148	218	140	142	96	167	52																		
Highwood	Horsham	1,090	2012/13	56	82	103	76	96	39	71	43	1																
Highfields Farm	South Derbyshire	1,064	2016/17	141	204	275	252	102	57																			
Boulton moor	South Derbyshire	1,058	2014/15	22	96	96	116	105	108	58	76																	
Gedling Colliery/ Chase Farm	Gedling	1,050	2017/18	25	65	96	64	90																				
North East Bexhill (The Gateway)	Rother	1,050	2020/21	23	67	68																						
South Maldon Garden Suburb	Maldon	1,042	2018/19	5	45	111	137	163																				
Tamworth Golf Course (Amington Garden Village)	Tamworth	1,037	2017/18	28	90	155	87	112	68																			
Monksmoor Farm	Daventry	1,000	2013/14	6	65	98	128	122	155	70	100	87	81															
Northampton North of Whitehills SUE	Daventry	1,000	2015/16	9	108	176	59	44	125	124	71																	
Weldon Park SUE	North Northamptonshire	1,000	2016/17	39	62	111	74	75	126																			
Land at former TRL site, Nine Mile Ride (Buckler's Park)	Bracknell Forest	1,000	2018/19	35	132	59	59	140																				
Arkall Farm, North of Ashby Road, Tamworth	Lichfield	1,000	2021/22	4	75																							
Limebrook Park, Wycke Hill, Maldon	Maldon	1,000	2019/20	5	60	85	110																					
RAF Cardington	Bedford	1,000	2014/15	5	108	100	109	36	57	81	144	276																
Collingtree Park - Northampton South SUE (JCS Policy N5)	West Northamptonshire	1,000	2020/21	98	100																							

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Northampton Upton Park SUE (JCS Policy N9)	West Northamptonshire	1,000	2020/21	4	130	139																						
Folkestone Harbour/ Seafront	Folkestone and Hythe	1,000	2021/22	84	40																							
Land to the north of Totton	New Forest	1,000	2022/23	51																								
Land West of Uckfield	Wealden	1,000	2018/19	3	50	45	35																					
Taylors Farm/ Sherfield Park	Basingstoke and Deane	991	2004/05	56	79	81	86	88	51	143	141	88	91	75	0	12												
Queen Elizabeth II Barracks	Hart	972	2012/13	56	165	110	228	213	112	91	13																	
Little Stanion	North Northamptonshire	970	2009/10	106	116	74	121	102	93	89	86	27	26	9	1	30												
North of Popley	Basingstoke and Deane	951	2007/08	65	57	16	28	0	0	15	118	84	60	75	103	73	93	23										
Ingress Park, Greenhithe	Dartford	950	2002/03	184	0	275	100	74	0	119	0	0																
Upper Cambourne	South Cambridgeshire	950	2012/13	88	123	239	201	96	81	83	32	7																
Nar Ouse Millenium Commuity	King's Lynn and West Norfolk	900	2007/08	32	77	0	0	0	0	30	22.5	22.5	68	0	37	13												
West Park	Darlington	893	2004/05	60	104	98	66	69	19	35	10	16	51	35	28	14	42	15	18	49	16	32						
Badbury Park (Commonhead)	Swindon	890	2014/15	49	230	241	138	127	73																			
Dowds Farm	Eastleigh	795	2006/07	54	189	187	44	102	47	66	76		30															
Abbotswood	Test Valley	790	2011/12	30	190	157	114	152	90	20	0	10	27															
Land at Popley Fields/ Marnell Park	Basingstoke and Deane	751	2006/07	105	172	118	186	126	44																			
The Parks, formally Staff College	Bracknell Forest	730	2007/08	104	88	101	54	47	72	59	94	78	0	0	0	0	0	0	0									
Northside	Gateshead	718	1999/00	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	46.8	16	30	31	33	25	43								
Land at West Blyth accessed from Chase Farm Drive	Northumberland	705	2008/09	6.25	6.25	6.25	6.25	32	66	51	127	78	90	62	37	53	58	56										
Alver Village (Rowner Renewal Project)	Gosport	700	2010/11	4	100	70	45	89	101	79	97	8	27	10	0													
Channels - North Chelmsford	Chelmsford	700	2015/16	31	172	110	70	61	88	0	76																	
Beacon Park (South Bradwell)	Great Yarmouth	700	2015/16	42	58	81	79	54	113																			
Foxhill/Mulberry Park	Bath and North East Somerset	700	2016/17	8	110	120	86	70	88																			
Land North of Harvest Ride and South of Forest Road and East of West End Lane, Warfeild	Bracknell Forest	675	2015/16	3	85	75	117	88	92	67	25																	

Site name	Local Planning Authority	Site size	Year of first housing completion	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25
				Dwellings per annum																								
Staiths South Bank	Gateshead	667	2003/04	24	58	0	44	0	48																			
Jurston Farm	Somerset West and Taunton	650	2019/20	16	43	31																						
Land south of Wansbeck General Hospital, Ashington	Northumberland	644	2005/06	18.7	18.7	18.7	18.7	18.7	18.7	18.7	17	24	37	60	57	54	50	60	82	64	0							
Kings Hill Phase 3	Tonbridge and Malling	635	2018/19	29	95	120	100																					
Former Pontins Holiday Camp	Lancaster	626	2006/07	16	22	4	5	0	0	0	0	0	0	0	0	0	0	0	0	0								
Ochre Yards (Ref: 103/01)	Gateshead	606	2004/05	83	68.2	68.2	68.2	68.2	68.2	0	0	46	4	52	2													
Land West of Southwater	Horsham	606	2017/18	56	128	43	20																					
Former Runwell Hospital	Chelmsford	575	2016/17	92	89	87	70	55	43	46																		
Land to the west of Wallingford	South Oxfordshire	555	2020/21	18																								
Land Nnorth of Netherhouse Copse	Hart	528	2021/22	52	104																							
Thingwall Lane	Knowsley	525	2013/14	79																								
St. James Village	Gateshead	518	2000/01	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	41.4	0	14	13	18	15											
Land at Siston Hill	South Gloucestershire	504	2006/07	77	211	96	63	57																				
Land west of Copthorne	Mid Sussex	500	2019/20	3	68	74	112																					

Appendix 3:
Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery, Leigh	Wigan	471
Farington Park	South Ribble	468
Kingsmead South	Milton Keynes	450
New Central	Woking	445
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	437
Land at former Battle Hospital	Reading	434
Hazelwalls Uttoxeter	East Staffordshire	429
New World House	Warrington	426
Pinn Court Farm	East Devon	426
Radyr Sidings	Cardiff	421
Halifax Road	Barnsley	414
Luneside West	Lancaster	403
Campden Road	Stratford-upon-Avon	400
Chard Road, Axminster	East Devon	400
Woolley Edge Park Site	Wakefield	375
Former NCB Workshops (Portland Park)	Northumberland	357
Hampton Heights	Peterborough	350
Cholsey Meadows	South Oxfordshire	341
Dunston Lane	Chesterfield	300
Land At Dorian Road	Bristol	300
Ryebank Gate	Arun	300

Site Name	Local Planning Authority	Size
Land At Fire Service College, Moreton in Marsh	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Land west of Hayne Lane, Honiton	East Devon	291
Long Marston Storage Depot Phase I	Stratford-upon-Avon	284
Land South of Park Road, Faringdon	Vale Of White Horse	277
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Hortham Hospital	South Gloucestershire	270
Land Between A419 And A417, Kingshill North	Cotswold	270
Land off Henthorn Road	Ribble Valley	270
GCHQ Oakley - Phase I	Cheltenham	262
128-134 Bridge Road and Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hewlett Packard (Land Adjacent To Romney House) Romney Avenue	Bristol	242
Hale Road, Wallingford	South Oxfordshire	240
Land adjacent to Tesco, Harbour Road, Seaton	East Devon	230
Hilton Lane, Worsley	Salford	209
Saxon Drive, Biggleswade	Central Bedfordshire	200
Great North Road, St. Neots	Huntingdonshire	199
Hoval Ltd North Gate	Newark and Sherwood	196
Bookbinder Lane, Prescot	Knowsley	191
Biggin Lane, Ramsey	Huntingdonshire	188
Notcutts Nursery	Cherwell	182
Land South of Inervet Campus off Brickhill Street	Milton Keynes	176

Site Name	Local Planning Authority	Size
Sellars Farm	Stroud	176
Queen Mary School	Fylde	169
Littleton Road	Salford	158
North End Road	North Somerset	154
Benson Lane, Wallingford	South Oxfordshire	150
Ottery Moor Lane (former industrial estate), Honiton	East Devon	150
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Shefford Road, Meppershall	Central Bedfordshire	145
Cornborough Road, Bideford	Torridge	143
Alfreton Road, South Normanton	Bolsover	142
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
Astley Road, Huyton	Knowsley	131
North of Douglas Road, Kingswood	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	129
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Shuttlewood Road & Oxcroft Lane	Bolsover	127
Primrose Mill Site	Ribble Valley	126
Bibby Scientific Ltd	Stafford	120
Bluntisham Road, Needingworth	Huntingdonshire	120
Land Between Godsey Lane And Towngate East	South Kesteven	120
Land West Of Birchwood Road	Bristol	119

Site Name	Local Planning Authority	Size
Former Bewbush Leisure Centre Site	Crawley	112
Land South of Station Road	East Hertfordshire	111
Canon Green Drive	Salford	108
Poppy Meadow	Stratford-upon-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Salisbury Road, Hungerford	West Berkshire	100
Auction Mart	South Lakeland	95
North East Sandylands	South Lakeland	94
Parcel 4 Gloucester Business Park Brockworth	Tewkesbury	94
Land At Green Road, Reading College	Reading	93
OS Field 9972 York Road Easingwold	Hambleton	93
Land off Lower Icknield Way, Chinnor	South Oxfordshire	89
MRIO Site, Caistor Road	West Lindsey	89
The Kylins, Morpeth	Northumberland	88
Dappers Lane, Littlehampton	Arun	84
St Marys Road, Ramsey	Huntingdonshire	82
Broad Street, Clifton	Central Bedfordshire	80
Southminster Road, Burnham-On-Crouch	Maldon	80
Land at Willoughbys Bank, Alnwick	Northumberland	76
North East Area Professional Centre	Crawley	76
Cranleigh Road, Chesterfield	Chesterfield	75
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft, Gainsborough	West Lindsey	69

Site Name	Local Planning Authority	Size
Former Wensleydale School, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Land off Crown Lane	Wychavon	68
Springfield Road/Caunt Road	South Kesteven	67
Land Off Cirencester Rd	Stroud	66
Land to the east of Newington Road, Stadhampton	South Oxfordshire	65
Land south of Pinchington Lane	West Berkshire	64
Iveshead Road, Shepshed	Charnwood	63
Mill Lane, Potton	Central Bedfordshire	62
Clewborough House School	Cherwell	60
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Hanwell Fields Development, Banbury	Cherwell	59
Land at the Beacon, Tilford Road	Waverley	59
Land To Rear Of 28 - 34 Bedale Road	Hambleton	59
Thorley Drive, Stoke-on-Trent	Staffordshire Moorlands	57
Shelford Road, Nottingham	Rushcliffe	55
Fenton Grange, Wooler	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm	Wakefield	50
Launceston Road, Bodmin	Cornwall	50
Part SR3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Oxcroft Lane	Bolsover	50

Appendix 4:
Solely apartment scheme details

XI Media City, Salford (1,100 units)	
Planning approval period	Planning Approval Period = 0.7 years 06/53636/FUL - Erection of four-26 storey buildings comprising 1036 apartments and 58,475 sq.ft of commercial space for A1,A2,A3,A4,A5,B1,D1 and D2 use together with associated car parking and alteration to existing and construction of new vehicular access Validated – 09/10/2006 Decision issued - 28/6/2007
Extended planning period	10/58887/FUL - Extension of time for implementation of planning permission 06/53636/FUL. Validated - 30/4/2010 Decision issued - 05/11/2012 15/66481/FUL - Amendment to previously approved planning permission 10/58887/FUL. Validated - 11/6/2015 Decision issued - 13/5/2016
Planning to delivery period	Planning to delivery period = 10.3 years
Build period	First completion in 2017/18. 2017/18 - 275 2018/19 - 0 2019/20 - 275 2020/21 - 0 2021/22 - 0 22/23 – 275 Works still ongoing
Notes from LPA	N/A

Prospect Place, Cardiff (979 units)	
Planning approval period	Planning Approval Period = 3.8 years Original outline application 98/425/R Validated – 14/09/1998 Decision issued - 01/03/2001 The first reserved matters application 02/00516/R Validated - 11/03/2002 Decision issued -21/06/2002
Extended planning period	03/724/R – Reserved Matters for 99 units 03/725/R – Reserved Matters for 58 units 02/1252/R – Full application including 677 apartments 03/01973/R – Full application including 222 residential units 04/2474c – Full changes, increasing the number of flats to 931, reduced to 927 during determination and granted in Feb 2006 06/00613/c – 394 units – granted in Oct 2006
Planning to delivery period	Planning to delivery period = 1.3 years
Build period	First completion in 2003/04 2003/04 - 157 2004/05 - 222 2005/06 - 0 2006/07 - 146 2007/08 - 160 2008/09 - 48 2009/10 - 0 2010/11 - 0 2011/12 - 0 2012/13 - 0 2013/14 - 0 2014/15 - 76 2015/16 – 170
Notes from LPA	The site was 'mothballed' for some years following the financial crash/recession with the principal Tower and another waterfront block not completing until several years later. Initially, this site required extensive and fairly unique land reclamation prior to commencement.

Hungate, York (720 units)	
Planning approval period	Planning Approval Period = 4.2 years Outline application 02/03741/OUT for 720 units Validated - 6/12/02 Decision Issued - 18/07/06 The first approved reserved matters 06/02384/REMM for Phase I erection of 163 units Validated - 27/11/2006 Decision Issued - 26/02/07
Extended planning period	07/01901/REM – Phase II – 154 unit 10/02534/REMM - variation of conditions to increase from 154 to 175 flats 10/02646/FULM – Phase I conversion to 7 townhouses to 14 flats 12/02216/FULM – Phase I conversion to 6 townhouses to 12 flats 12/02282/OUTM – outline to redevelop for 720 units – extension of time to 02/03741/OUT 13/03015/FULM – Phase II 195 units 15/01709/OUTM – Outline for Blocks G and H, 86 and 101 units 17/03032/REMM - Block G 196 units 18/02946/FULM – Increasing Block D to 196 units (increase of 10 units)
Planning to delivery period	Planning to delivery period = 2.6 years
Build period	2009/10 to present. 2009/10 - 163 2010/11 – 0 2011/12 - 0 2012/13 - 5 2013/14 - 1 2014/15 - 0 2015/16 - 0 2016/17 - 0 2017/18 - 195 2018/19 - 0 2019/20 - 101 2020/21 - 0 2021/22 - 0 2022/23 - 0 Blocks D, G and H not developed out yet
Notes from LPA	Build figures provided by York Council. The Council confirmed that there has been a significant complexity in delivering this site and consequently monitoring of delivery.

Pomona Docks II, Trafford (526 units)	
Planning approval period	Planning Approval Period = 3.2 years Full application for 546 apartments (H/58948) Validated – 10/03/2004 Decision Issued – 09/05/2007
Extended planning period	The above scheme was never implemented. 93779/FUL/18 for 526 dwellings across three apartment blocks Validated – 13/03/2018 Decision Issued – 11/04/2019 This has been subject to a number of DoC/NMAs since.
Planning to delivery period	Unknown – unable to obtain completions data to identify year of first completion
Build period	Ongoing – unable to obtain completion data from the Council.
Notes from LPA	As of October 2023 advised that the first 2 towers are complete and construction is underway on the 3rd tower.

University Campus, Chelmsford (645 units)	
Planning approval period	Planning Approval Period = 1.7 years Outline 02/02073/EIA for redevelopment of 692 residential units Validated – 05/02/2003 Decision Issued (appeal) – 17/10/2003 This outline consent was subsequently varied by 04/01825/FUL, principally to provide for a phased discharge of conditions. A reserved matters application was submitted for most of the southern part of the site (04/00865/REM). Validated – 19/04/2004 Decision Issued – 08/10/2004
Extended planning period	Following a public inquiry relating to Stopping Up Orders to paths between Victoria Road South and Park Road and Parkway and Park Road and the confirmation of the Orders (October 2005 FPS/W1525/5/1 refers), the site was sold to Genesis Housing Group in 2007. A long process of exploring land use and design solutions to resolve commercial and planning objectives followed. Another outline application (11/01360/OUT) and a full application (11/01360/FUL) were both submitted for the Part full (Phase 1), part outline (Phase 2) Validated - 31/08/2011 Decision Issued - 02/11/2012 A further full application (14/01470/FUL) for Phase 2 - mixed-use redevelopment including residential Validated - 09/09/14 Decision Issued - 06/02/15
Planning to delivery period	Planning to delivery period = 10 years
Build period	First completions in 2014/15 2014/15 - 216 2015/16 - 3 2016/17 - 0 2017/18 - 0 2018/19 - 426
Notes from LPA	N/A

Land adjoining Manchester Ship Canal – Trafford (449 units)	
Planning approval period	Planning Approval Period = 4.4 years Outline application for up to 550 dwellings (APP: H/OUT/68617) Validated - 24/12/2007 Decision Issued – 30/07/2010 First reserved matters application (78681/RM/2012) Validated – 12/05/2012 Decision Issued – 27/07/2012
Extended planning period	86160/OUT/15 - Application to extend the time limit for the implementation of H/OUT/68617 Validated – 09/07/2015 Decision Issued – 26/09/2019 The overall area was split between two separate sites- 'Land off Hall Lane' and 'Lock Lane'. The reserved matters application for Lock Lane concluded that only 298 dwellings would be included within the development (APP: 100110/RES/20). Validated – 17/02/2020 Decision Issued – 27/01/2021 Meanwhile, a full planning application was submitted for 151 dwellings relating to the Land off Hall Lane part of the site (APP: 100109/FUL/20) Validated - 17/02/2020 Decision Issued – 24/03/2021
Planning to delivery period	N/A - No delivery to date
Build period	None to date
Notes from LPA	N/A

Ordsall Lane, Salford (394 units)	
Planning approval period	Planning Approval Period = 0.7 years Full planning application 19/74531/FUL Validated - 13/12/2019 Decision Issued - 12/08/2020
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 1.1 years
Build period	First completions in 2021/22 2021/22 - 121 2022/23 - 273 Complete in 2 years
Notes from LPA	N/A

Chatham Street Car Park, Reading (307 units)	
Planning approval period	Planning Approval Period = 2.4 years Outline application 03/00825/OUT Validated - 17/07/2003 Decision Issued - 12/10/2004 Full application 05/00849/FUL/JL for phase I comprising a mixed use development including 307 residential units Validated - 27/07/2005 Decision Issued - 29/11/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2.8 years
Build period	First completions in 2008/09 2008/09 - 96 2009/10 - 120 2010/11 – 91 Complete in 3 years
Notes from LPA	N/A

Land at Canons Marsh Road, Bristol (272 units)	
Planning approval period	Planning Approval Period = 4 years Outline planning permission 01/00986/F was first resolved to be approved in October 2001 and the s.106 agreement signed in February 2003. Validation – 01/10/2001 (we do not have a validation date for 01/00986/F so we have used the committee date, as the earliest date we can obtain) Decision Issued – 01/02/2003 Phase 2 - Section 73 Permission Ref: 04/03230/X which encompassed Building 9 for residential development Validated – 30/07/2004 Decision Issued – 03/10/2005
Extended planning period	N/A
Planning to delivery period	Planning to delivery period 2 years
Build period	First completions in 2007/08 2007/08 - 62 2008/09 - 145 2009/10 - 6 2010/11 - 33 2011/12 - 23 2012/13 – 3
Notes from LPA	N/A

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Contacts

Speak to your local office or visit our website.

Birmingham

Jon Kirby
jon.kirby@lichfields.uk
0121 713 1530

Bristol

Nick Thompson
nick.thompson@lichfields.uk
0117 403 1980

Cardiff

Andrew Cockett
andrew.cockett@lichfields.uk
029 2043 5880

Edinburgh

Nicola Woodward
nicola.woodward@lichfields.uk
0131 285 0670

Leeds

Christopher Darley
christopher.darley@lichfields.uk
0113 397 1397

London

Matthew Spry
matthew.spry@lichfields.uk
020 7837 4477

Manchester

Simon Pemberton
simon.pemberton@lichfields.uk
0161 837 6130

Newcastle

Harvey Emms
harvey.emms@lichfields.uk
0191 261 5685

Thames Valley

Daniel Lampard
daniel.lampard@lichfields.uk
0118 334 1920

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Illustrative Masterplan wider context
Land north west of Olney
Milton Keynes

A1

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Note: This drawing and schedule is based on the information supplied by others, the accuracy of which we cannot guarantee. No consultation has taken place with the planning authority and as such the above proposal should not be used as a basis for financial or commercial transactions.

CLIENT:

LAND & PARTNERS

McBains
McBains Ltd
5th Fl, 26 Finsbury Square London EC2A 1DS
+44 (0)20 7786 7900 mcbains.co.uk