

Our response to the Vale of Aylesbury Local Plan

1. General comments

There is much in the Vale of Aylesbury Local Plan that sounds exciting and that should improve life for residents but we believe that the Vision is limited. Also, the one huge flaw is the extent of AVDC's authority. The first thing any resident mentions when new development is proposed is that the infrastructure will not be in place and so much of this plan is about the infrastructure (the responsibility of Buckinghamshire County Council). It is welcome, however, to see that 11.5 refers to a joint review of the Buckinghamshire Green Infrastructure Strategy. Could the County Council and AVDC not work more closely on this and more publicly? It would have been excellent to have seen BCC at the recent consultation events showing a real commitment to deliver infrastructure in a timely manner.

Our comments and recommendations are addressed to whichever Council is responsible as well as to AVDC for co-ordination of the Plan.

2. How the housing requirement was produced

In this section we outline the key issues relating to the housing requirement within the VALP and its supporting evidence. The huge 'Objectively Assessed Need' for new dwellings demands close attention, given that this will inevitably mean that extensive areas of valued countryside will be lost forever. The countryside should be valued as an asset in its own right, and its loss – any of it – is a permanent and irrevocable loss to future generations.

Aylesbury Vale Green Party believes that any need for new housing must be balanced against the fact that construction itself requires massive non-renewable resources, and that once built, however energy-efficient they may be, new dwellings in the countryside represent a new *locus* of energy and resource consumption where only countryside lay before. It is also becoming evident that the need for new housing of the right type is not being met by a profit-driven system, and probably never will be in a system premised on meeting demand, rather than need. In our view, therefore, the requirement for housing needs to be very critically examined.

The key document supporting the assessment of housing need is the Buckinghamshire HEDNA (the BHEDNA), published in January 2016 and modified from the earlier Central Buckinghamshire HEDNA following the decision of South Bucks and Chiltern District Council to produce a joint local plan.

We commend ORS/Atkins for their work in producing the BHEDNA. It is a complex and thoughtful piece of work, and one where, as the authors readily accept, huge uncertainties abound. It might be possible to dispute many areas of their findings, but in reality a few main points emerge where the uncertainties loom large and have significant effects.

The CLG Household Projections.

Government guidance clearly states that these should be a starting point, and we again commend ORS/Atkins for their very careful analysis of the reliability of the Household Projections, and the adjustments they make. But, as the Office of National Statistics (ONS) itself states, these are projections of trends, not predictions. These projections are themselves based largely on trends identified between 2001 and 2011. More importantly, they are projections based on an unusually high period of demographic growth, driven by a combination of (until 2008) high economic growth and high levels of international migration. Until this year, it might have been reasonable to assume that this pattern might resume at some point, but the UK has now elected to leave the European Union and it is clear that assessments of growth and migration now need to be reconsidered.

The Need to Cooperate and Market Signals

We understand that to cooperate is a statutory requirement under the 2011 Localism Act, but it does lead to some curious results, which the inclusion of South Bucks in the BHEDNA has, if anything, made worse. Figure 123 very succinctly summarises the stages and adjustments made, and perhaps the most significant is the adjustment made for 'market signals'. We understand that guidance requires this adjustment, while specifically forbidding planners from actually calculating what the impact might be of the 'uplift' required. This explains why the figures of 10% for AVDC and 20% for the southern Districts are arbitrary when compared with the far more considered adjustments for second homes and the like, and are based on what appears to be a rather 'finger-

in-the-wind' guess by an Inspector in Eastleigh, in the absence of any meaningful guidance from central government. The impact, meanwhile, is huge. For the southern Districts, the increase amounts to 4253 new dwellings - about the size of the potential new development to be imposed on either Haddenham or Winslow. We appreciate that other factors would lead to a significant, if lower uplift, but these are equally questionable and we discuss them below.

The 20% figure is based on the affordability of housing in these generally affluent Districts. But when this uplift is carried into the VALP it is stated that the AVDC requirement may be increased by 12,000 dwellings to allow for the fact that many of these new dwellings cannot be built in the southern Districts. But the problem of affordability in those Districts arises because commuting and migration flows identify strongly with London, not the Vale. Put simply, how many houses might one build in Winslow before Gerrard's Cross becomes affordable? The fact is that affordability will always be a problem in an AONB with excellent commuter links to the capital - no amount of housebuilding will solve this.

3. Variety of housing

It is essential that the Council use forms of housing provision where affordability can be guaranteed irrespective of the wider market conditions, such as social and co-operative housing, and encourage self-build and custom-build that directly meets peoples' needs while empowering the builders/occupants. Mutual retirement housing and specialist retirement co-housing should be included in the Plan.

Para. 5.64 It is important that extra care accommodation is provided on almost all developments and essential that the Plan does not limit its threshold to only 'large' developments. **It is important that villages continue to grow their provision for the elderly and extra-care needs as much as other areas. We recommend they at least maintain the proportion of such housing.**

We believe that the Council should require Housing Associations to set rents at levels that ensure genuine affordability for those on low incomes.

Significantly more affordable housing should be provided because house prices are so high here. Para.5.1 states 'To enable the council to meet a **proportion** of the identified need it will seek to secure a minimum of 31% affordable housing on qualifying development sites'. **The requirement needs to be clarified. Identified need should be fully met not just a 'proportion'. The percentage should be adjusted upwards if necessary.**

4. Land ownership

It is Green Party policy that 'where public land is used for the provision of housing, it should either remain in public ownership or be transferred to a Community Land Trust to preserve it as a community-owned asset. Where any public land or homes are transferred to a co-operative, a legally binding non-demutualisation clause should be written into the contract to ensure as far as possible that they aren't subsequently privatised.' We would like to see the VALP uphold these principles, which will be to the benefit of all residents.

5. Green Belt

We recommend that the Green Belt should be protected or people will have no confidence at all in the integrity of planners and councillors.

6. Aylesbury as a Garden Town

The idea of a Garden Town sounds appealing but unfortunately there is not a lot in section 4 to D1 that gives an indication that the Garden element is anything other than a funding opportunity. There is no commitment to anything positive and exclusively Garden Townish. The Town & Country Planning Association suggest that 21st century Garden City principles include:

Principle	Mentioned in the Plan?
Land value capture for the benefit of the community.	No.

Strong vision, leadership and community engagement.	No. The emphasis is on what developments will be permitted, not on positive encouragement and facilitation.
Community ownership of land and long-term stewardship of assets.	No.
Mixed-tenure homes and housing types that are affordable for ordinary people.	Yes but more detailed proposals needed, especially as regards imaginative provision of adequate housing for an ageing population.
A strong local jobs offer in the Garden City itself, with a variety of employment opportunities within easy commuting distance of homes.	Yes – but then why is the main attraction of the eastern Enterprise Zone stated to be its proximity to the A41 with easy access to the M25?
Beautifully and imaginatively designed homes with gardens, combining the very best of town and country living to create healthy homes in vibrant communities.	Not really. The only technical standards acknowledged are those for density of dwellings and space per person. A lot more could be said about energy-efficient and environment-friendly building standards.
Generous green space linked to the wider natural environment, including a surrounding belt of countryside to prevent sprawl, well connected and biodiversity rich public parks, and a mix of public and private networks of well-managed, high-quality gardens, tree-lined streets and open spaces.	Yes – this is part of the ‘green infrastructure network’. But community education and engagement are crucial.
Opportunities for residents to grow their own food, including generous allotments.	Yes.
Strong local cultural, recreational and shopping facilities in walkable neighbourhoods.	Yes.
Integrated and accessible transport systems – with a series of settlements linked by rapid transport providing a full range of employment opportunities.	The phrase ‘integrated transport’ isn’t used, and there is very little mention of public transport.

We recommend that the next iteration of the VALP should include all these elements and a real vision of what could be achieved.

7. A new settlement

We believe that AVDC should challenge the requirement for taking non-allocated housing from the south of the County, in which case, it is possible that the housing will not be required.

The suggested alternatives for a new settlement are Haddenham and Winslow.

In neither case will it work to have a new ‘town’ with its own infrastructure tacked onto it in the way suggested in the VALP.

It would be better to have a totally new town elsewhere or to increase housing in a circle around a present centre. The latter would, at least, provide a feeling of organic growth and could be implemented over a long period.

8. Sites adjacent to Milton Keynes

It is suggested that 4,274 houses are built adjacent to Milton Keynes.

We question the plan to have a part of Aylesbury Vale contiguous with Milton Keynes housing at Bletchley. There would be huge disadvantages in the future for the residents to be still part of AVDC and not able to vote in MK elections for those who will have their best interests at heart and whose infrastructure and amenities they will be sharing. It will also be difficult to manage school provision as two separate authorities. If the plan is to integrate this development into Milton Keynes, then that should be stated in the next iteration of the VALP.

Recommendation: The new settlement and the sites adjacent to MK will only be needed if Aylesbury Vale takes the unallocated housing from the south of the county. Aylesbury Vale Green Party believes that the Council must challenge these figures and the rationale behind them.

9. Green Infrastructure

Aylesbury Vale Green Party welcomes the proposals to create a "Green Infrastructure" and in particular the specifications contained in pages 194-195 (section 11.10). We would wish to see robust guarantees of such improvements being introduced together with sound monitoring of these, hopefully in partnership with local interest groups. It is difficult for district council planning officers to effectively monitor new development and of the potential for developers to dilute planning conditions in order to maximise their profit margins. **We believe that developers must be required to enter into binding infrastructure obligations that are properly policed and with serious financial penalties for those that fail in their obligations.**

We note that the proposals are hedged with words such as "could" and "should" – better walking and cycling routes are urgently required already in response to the existing large-scale extensions to Aylesbury and other communities. A glaring example of walking and cycling infrastructure failing to keep pace with development is the continuing failure to build a cycle-/pedestrian-way between Haddenham & Thame station and Thame. Thame is recognised as providing important infrastructure for the people of Haddenham, but the County Council, which is leading on the possibility of building such a route, is acting with complacency. This further emphasises the need for the district, county and parish / town councils to work closely together. **We believe that no Local Plan should be adopted before the Infrastructure Delivery Plan and the related CIL (Community Impact Levy) are in place.** Section 3.54 of the VALP mentions adoption of this in 2017.

Cycle and pedestrian routes have to be designed properly and maintained. Whilst the present system of cycle "gem routes" in Aylesbury is welcome, many cycle routes are not safe or wide enough, e.g. the one along the east side of Cambridge Street. When cycle paths are provided they should be state-of-the-art, not the narrowest that will serve. In order to achieve a significant shift from vehicles to more sustainable walking and cycling, there has to be a meaningful change in planning culture, comparable to the one that has taken place in London with the introduction of long-distance cycle routes that are separated from vehicles. At present, Aylesbury planners seem stuck in the past. For example, at Broughton Crossing the road serving the new housing has been re-opened "for vehicular traffic only / no pedestrian access". This is shameful. Is it beyond the wits of planners / development control officers to insist that footpaths be constructed at the same time as roads?

The proposals to link communities with cycle and pedestrian paths is commendable, but again past experience indicates blindness on the part of the local authorities, with paths between Aylesbury and Weedon or between Stone and Dinton, for example, being allowed to deteriorate to almost the point of invisibility.

We recommend that resources are re-prioritised from favouring vehicular traffic to giving an adequate share to walking and cycling, in order to ensure that sustainable transport remains sustainable and is fit for purpose. The more people who choose sustainable transport over motorised transport, the better things are for those who are required to use motor transport. Given the potential increase in motor transport, it would be irresponsible not to do as much as possible to limit its growth or, ideally, reduce the volume of motor transport, essential on health, environment and carbon reduction grounds.

In 11.4 quoting the Aylesbury Vale Green Infrastructure Plan the VALP recognises the two areas in the Vale which least meet the ANGSt in terms of green infrastructure. Aylesbury environs and Winslow are particularly poorly served. It is important that any planning in those areas specifically addresses the need to improve this situation. In the case of Winslow it is not close enough to Whaddon Chase to make any proposed green infrastructure development there a significant improvement. Particular attention must be given to the needs of this growing town.

We believe that it is important that responsibility is assigned for the delivery of the green infrastructure.

10. Energy

The Vale of Aylesbury plan is an opportunity to build for the future and make housing truly affordable. Housing costs aren't just limited to the cost of the mortgage or rent, but a substantial amount of a family's budget is spent on energy. **We recommend that the Council requires that all domestic buildings should be energy neutral. Even ensuring that this is the case for social housing would be a good start.** Bulk-buying energy schemes for new estates would be desirable.

All industrial development should be required to maximise renewable energy production, through whatever means available – solar, wind, geothermal, etc. Para.4.96 states that there is already over capacity in terms of industrial and commercial land provision. **We recommend that the Council insist that any land not required for industry itself should be used for renewable energy production, be that solar or wind or a combination of both, rather than being re-directed to housing. Such schemes could significantly reduce the energy costs of neighbouring businesses.**

We recommend that the Council should take all possible opportunities to generate solar electricity at its sites. This should include car parks, e.g. where roofed cycle stores can have solar panels, park buildings, public conveniences. This should be stated so that developers can plan accordingly.

11. Transport

Car parking is a real headache for any council and AVDC is correct that not allocating parking in new developments does not help reduce it. New ways of tackling parking issues are required, for example, rewarding use of garages again. The effect of this could be to reduce hard paving and enable water runoff, saving councils from significant flooding expense in the future. **We recommend that wherever public areas are provided for parking the surface should be permeable and that the Council investigate ways of rewarding public-spirited behaviours by residents.**

The electric vehicle strategy is to be welcomed. **We recommend that a policy should be in place to ensure that electric vehicles and bicycles are given parking priority at any Council site.**

There is no mention of buses. **We recommend that the Plan should include a separate policy on public transport and this should be to encourage electric/dual-fuel buses in order to prevent air pollution in towns.** The County Council may need to run the bus transport in order to achieve this.

Comments on cycle paths are included in our Green Infrastructure section.

12. Jobs

Para 1.46 There are 71,700 jobs in the Vale. There is currently a net loss from the area into other places of employment of 15,153 workers. There is expected to be a population increase of 23% between now and 2033 and ideally there should be a similar increase in the number of jobs so that more people do not have to travel out of the Vale to work, although it is likely that east-west rail will impact by people travelling to Milton Keynes and Oxford to work. **We recommend that new jobs are supported that will keep workers in the Vale - ideally for green industries, and, that their place of work is accessible by public transport.**

The projected maintenance depot for HS2 at Twyford could provide welcome employment should HS2 be built, and we recommend that good cycle links are provided to the site.

In conclusion

The Green Party believes that 'everyone should have housing appropriate to their needs that is affordable, secure and comfortable'. We would like to see AVDC adopt rigorous housing

requirements for affordable and other specific housing and ensure that developers deliver. We recognise that councils are often limited in their ability to ensure that developers play by their rules, but the land in Aylesbury Vale is not that difficult to build on and houses command 'good' prices so it should be possible for AVDC to attract developers while demanding high standards. We note that there is no mention of Low Impact Development in the VALP. Some councils now have policies relating to this. Because the housing and the lifestyles are so low impact such developments can be successfully located in areas where other housing would not be allowed.

Lastly, we believe that local councils should have a stronger, freer voice in local housing policy than the present government allows them. We will continue to press for these aims in our work.

The VALP is an opportunity for real vision. Some of it is there and plenty more can be delivered.