

For internal Use only	ID:		Rep No:	

Proposed Submission Vale of Aylesbury Local Plan RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 9am Thursday 2 November until 5.15pm Thursday 14 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Colin"/>
Last Name	<input type="text" value="Blundel"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Chiltern Society"/>
Address Line 1	<input type="text" value="White Hill Centre"/>
Address Line 2	<input type="text" value="White Hill"/>
Address Line 3	<input type="text" value="Chesham"/>
Post Code	<input type="text" value="HP5 1AG"/>
E-mail Address	<input type="text" value="planning@chilternsociety.org.uk"/>
Telephone Number	<input type="text" value="01494 771250"/>

2. Agent's Details (if applicable)

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation	<input type="text"/>
Address Line 1	<input type="text"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have completed a response using the Council's online system for this consultation. Duplicates will not be considered.

Please specify which section of the Proposed Submission Local Plan your comments relate to by choosing one of the following:

Which section are you responding to?

e.g. Paragraph/Policy/Other

Policy S4

Do you consider the Local Plan to be legally compliant?

Yes No

Does the Local Plan comply with the Duty to Co-operate?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

We strongly support the inclusion of a specific policy in relation to the Green Belt, which is consistent with national policies in paragraphs 79 – 91 of the National Planning Policy Framework. In particular, it is important to preserve the openness of the Green Belt and fulfil the 5 purposes for including land within it.

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

Please specify the changes needed to be made to make the Plan sound/ legally compliant:

Do you wish to participate at the oral part of the examination?

If Yes - you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Do you wish to be notified...

When the Vale of Aylesbury Local Plan is submitted for independent examination? When the Inspector's report is published?

When the Vale of Aylesbury Local Plan is adopted?

Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury Vale District Council by 5.15pm Thursday 14 December 2017 (responses will not be accepted after this time)

PART B

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Please specify which section of the Proposed Submission Local Plan your comments relate to by choosing one of the following:

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RAF Halton - Site Ref HAL003 Paras 4.131 – 4.138, Policy S4

Do you consider the Local Plan to be legally compliant?

Yes No

Does the Local Plan comply with the Duty to Co-operate?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

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As drafted we consider that the allocation of the RAF Halton site could lead to the site's removal from the Green Belt in the long term and would therefore not be consistent with national policy as set out in paragraphs 79 – 91 of the National Planning Policy Framework (NPPF). In particular the development must satisfy paragraphs 79 and 80 relating to the openness and permanence of the Green Belt and the 5 Green Belt purposes. The Council has not demonstrated that exceptional circumstances exist for potentially removing the site from the Green Belt in future, thus contradicting paragraph 83 of the NPPF. We do not accept that pressure for housing is a valid reason for demonstrating exceptional circumstances.

The RAF Halton site is located entirely within the Green Belt and in the immediate setting of the Chilterns AONB. Therefore we consider that any development here must be carefully designed to fully respect these designations.

We agree with the Council that the RAF Halton site should be retained within the Green Belt. However, it is unclear whether the proposed figure of 1000 homes is based on applying a density calculation across the whole area or by considering the overall volume of development which would be equivalent to the existing buildings on site. In order to retain the openness of the Green Belt the Council must not increase the volume of development over and above the existing if it is to comply with national policy in the NPPF in relation to openness and the 5 purposes of the Green Belt.

In calculating the quantity of development we would expect the Council to re-use existing buildings where possible, and particularly the existing Listed barracks blocks. The development should be designed so as not to lose the aviation heritage of the site.

Paragraph 4.135 suggests that the site would not be removed from the Green Belt 'at this stage', but this implies that it may be removed in the future to allow further development. We would object to the removal of the site from the Green Belt because this additional development would harm the purposes of the Green Belt and the setting of the AONB. The Council has not demonstrated that exceptional circumstances exist for amending the boundary of the Green Belt in this location.

We are pleased to see that a Masterplan is to be prepared to plan for a comprehensive development of the site, adopting Garden Town principles. This should enable a high quality development to be planned that incorporates substantial landscaping and green infrastructure. By taking this approach and restricting development to the same volume as the existing, it should be possible to avoid significant impacts on the purposes of the Green Belt and the setting of the AONB.

The Masterplan, as well as planning for housing, needs to provide appropriate infrastructure and employment opportunities to serve the new residents of the site.

The Masterplan should cover the whole site at this stage and work within existing Green Belt constraints, and particularly not reducing openness or threatening the permanence of the Green Belt. It should not leave part of the site for future development of a Phase 2 with the land being taken out of the Green Belt.

We also consider that a gap should be retained between the developed area and Halton village to ensure that the village retains its own identity.

We support the place-shaping principles in paragraph 4.137, the vision and objectives in paragraph 4.138 and the criteria in the associated table. These would all contribute to the high quality of development that is required in such a sensitive location.

We welcome the removal of the proposed housing site for 800 houses at Tring Road, Wendover from the previous plan. The use of a previously developed site at RAF Halton, with careful design, should be able to have less impact on the Green Belt and AONB.

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

We consider that the RAF Halton site should remain within the Green Belt in the long term and that any development should not reduce the openness of the Green Belt. The plan should remove the reference to removing the site from the Green Belt in the future.

We support the proposal to prepare a Masterplan to design a high quality scheme with landscaping and green infrastructure to avoid detrimental impacts on the setting of the Chilterns AONB.

Please specify the changes needed to be made to make the Plan sound/ legally compliant:

The plan should remove the reference to the potential to remove the site from the Green Belt in future to allow for additional development.

Do you wish to participate at the oral part of the examination?

No

If Yes - you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Do you wish to be notified...

When the Vale of Aylesbury Local Plan is submitted for independent

examination? When the Inspector's report is published?

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**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury Vale District Council by 5.15pm Thursday 14 December 2017
(responses will not be accepted after this time)**

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Policy NE4 Chilterns AONB and setting

Do you consider the Local Plan to be legally compliant?

Yes No

Does the Local Plan comply with the Duty to Co-operate?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

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We strongly support the inclusion of a separate policy in relation to protection of the Chilterns AONB and in particular the adoption of the Chilterns Conservation Board's model AONB policy. The inclusion of this policy ensures that the Local Plan complies with paragraphs 115 and 116 of the NPPF and translates that to the local situation.

However, the policy refers to 'major developments' in the AONB and suggests they are defined by national policy. The NPPF does not define 'major developments' and case law has concluded that its meaning in relation to AONBs is different to that used to describe planning applications based on the number of houses.

The policy could be made more effective by adding some text to define how the Council would define 'major development' in an AONB context.

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

Please specify the changes needed to be made to make the Plan sound/ legally compliant:

Add additional text to define 'major development' in the Chilterns AONB.

Do you wish to participate at the oral part of the examination?

Yes No

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