

**DRAFT SOUTH EAST  
PLAN**

**EXAMINATION IN  
PUBLIC**

**NON-PARTICIPANT'S  
WRITTEN  
STATEMENT**

**MATTER 8Fiii**

**AYLESBURY TOWN  
AND AYLESBURY  
VALE**

**MATTER 8 – SUB REGIONAL STRATEGY**

**SUB-MATTER 8F – MILTON KEYNES AND AYLESBURY VALE**

**8Fiii AYLESBURY TOWN AND AYLESBURY VALE**

**8Fiii.1 Does the draft RSS give sufficient priority to strengthening the economy of Aylesbury town, and how will this be achieved?**

- 1.1 We support the priority given in the draft RSS to strengthening Aylesbury's economy in order to address, most notably, the high existing levels of out-commuting from the town. However we consider that this priority should be strengthened further by increasing the proposed levels of housing and employment provision at Aylesbury town. Such an increase would, in our opinion, be deliverable and beneficial to the town, with increased residential provision creating a greater potential workforce and an increased catchment to encourage the provision of new facilities, particularly higher order retail / leisure provision in the town centre. This matter is explored at further length in other submissions and as such we do not elaborate further here.

**8Fiii.2 Does the level of housing provision proposed for Aylesbury town post 2021 take appropriate account of its growth status, local constraints and opportunities and current build rates?**

- 2.1 We do not consider that the level of housing growth proposed in the five-year period from 2021-2026 (4,200 dwellings) takes proper account of Aylesbury's Growth Area Status. This provision is lower than the requirement of the adopted Buckinghamshire Structure Plan for the 5-year period from 2001-2006 (5,000 dwellings), a figure which was arrived at prior to the identification of Aylesbury as a Growth Area. It is also slightly lower, on a pro rata basis, than the MKSM Strategy's provisional

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assumption of 8,500 dwellings from 2021-2031, a figure arrived at prior to the required step change in housing provision sought by the Barker Review and PPS3. We therefore consider that there is a strong case for higher housing provision in this period, and indeed from 2006-2021, having regard to:

- i. The need for higher levels of housing provision/delivery generally in the region;
- ii. The Government's response to the Barker Review of Housing Supply, which accepts the case for a step-change in housing supply in order to meet demand for market and affordable homes;
- iii. PPS3: Housing (2006) which underpins the Government's response to the Barker Review and the necessary step-change in housing delivery by establishing a new more responsive approach to land supply;
- iv. The economic benefits of further growth at Aylesbury;
- v. The conclusions of the report produced by Roger Tym and Partners entitled 'Augmenting the Evidence Base for the Examination in Public of the South East Plan' that identifies Aylesbury as one of five identified locations in the south east region considered to offer the greatest potential to accommodate growth levels above those in the draft RSS on the basis that they are least affected by Group 1 (higher level) environmental constraints;
- vi. The availability of large, sustainably located and deliverable sites (in accordance with the definition in PPS3) to the south of Aylesbury.

2.2 With regard to the first point, significant evidence has been submitted to and heard at the EiP with regard to the need for a level of housing provision that exceeds that proposed in the draft RSS. On this basis, we do not repeat this case here. However we consider that, at the very least, post-2006 housing requirements for Aylesbury town should be increased by rolling forward the 780 unit shortfall in provision from 2001-2006 (illustrated in the table below) to ensure that this already committed growth is not lost:

	<b>Housing Requirement for Aylesbury Town (MKSM Strategy)</b>	<b>Net Housing Completions at Aylesbury Town</b>	<b>Shortfall/ Excess</b>
2001/02	480	207	-273
2002/03	480	272	-208
2003/04	480	471	-9
2004/05	480	397	-83
2005/06	480	273	-207
<b>2001/06</b>	<b>2400</b>	<b>1620</b>	<b>-780</b>

*SOURCE: AYLESBURY VALE LOCAL DEVELOPMENT FRAMEWORK ANNUAL MONITORING REPORT 2006*

- 2.3 With regard to the second and third points, both the Government’s Response to the Barker Review of Housing Supply and the subsequently published PPS3 demonstrate the Government’s commitment to achieving a step change in housing supply. This commitment relates not just to the allocation of increased housing numbers but also to delivery (considered later in this submission), with identified sites now required to satisfy the three PPS3 tests of availability, suitability and achievability.
- 2.4 The fourth point is considered in our submissions under 8Fiii.1 and explored in further detail in other submissions.

- 2.5 We do not consider that the fifth point requires further explanation as the conclusions of the Roger Tym report, which has been submitted to the EiP, are clear in terms of the potential for additional growth, above draft RSS levels, at Aylesbury.
- 2.6 The final point is, however, of particular importance and as such is worthy of elaboration.
- 2.7 Having regard to technical work undertaken for the Sub-Regional Steering Group, paragraph 2.2 of the January 2005 draft RSS identified that the south of Aylesbury town was the most appropriate area of search for new development to be tested through the LDF process. This reference was removed from the March 2006 submission draft, although further support for development to the south of Aylesbury town has come from subsequent work undertaken by Aylesbury Vale District Council who, in June 2006, published its draft Core Strategy and Site Allocations document. Drawing upon the outcome of detailed highways and landscape assessments, this Document acknowledges that urban extensions to the south of Aylesbury would be easier to accommodate having regard to the capacity of the road network and relevant environmental constraints. We would add that development to the south of Aylesbury would also;
- balance the growth of the town, having regard to the major developments already committed (but not yet built) at north Aylesbury;
  - increase the overall prospects of housing delivery at Aylesbury by providing a range of development locations, increasing choice and demand and consequently increasing the likelihood of higher completion levels;

- be deliverable - land to the south of Aylesbury, and particularly an area of approximately 180 hectares immediately adjacent to the south west of the town, is suitable for development and is in single ownership i.e. available and achievable.

2.8 Against this background we consider that Aylesbury, and particularly south Aylesbury is suitable for, and capable of, delivering housing numbers in excess of those in the draft RSS. Importantly, however, and in the absence of the identification of south Aylesbury as a broad location for growth in the RSS, delays in the production of Aylesbury Vale District Council's Local Development Framework are likely to create problems for housing delivery in the short / medium term. AVDC has recently indicated that its Core Strategy and Site Allocations Document for Aylesbury will not be adopted until late 2009. If applications for development on new sites are delayed until the adoption of the Document, or at least until a binding Inspector's report is received this delay, together with the lengthy lead times associated with major developments (even those already in single ownership), could obstruct housing delivery until 2011 at the earliest. Such a delay would exacerbate the significant delays already experienced at the Council's two other primary residential allocations at Weeden Hill and Berryfields, neither of which has delivered any completions to date.

2.9 In these circumstances we consider that the identification of south Aylesbury as a broad location for growth in the RSS is appropriate and necessary, creating a strategic policy framework to support, if necessary, the release of land to meet housing needs in the short/medium term. We note that the broad identification of a development location in this manner is supported by the provisions of PPS11 (paras 1.16/1.17), and that such a reference would in fact constitute re-instatement of that originally made in the January 2005 draft of the RSS (para 2.2).

### Build Rates

- 2.10 As referenced previously, there has been a shortfall of 780 units at Aylesbury town in the period 2001-2006. This shortfall is due primarily to the failure of both of the Council's major residential allocations (the MDA's at Weeden Hill and Berryfields) to deliver any completions to date. One of the primary reasons for these significant delays relates not to the inability of housebuilders to construct units quickly, but to the fact that the lead times for these developments were significantly longer than those assumed by the Council.
- 2.11 It is essential in providing for future growth at Aylesbury, at either draft RSS levels or at a higher level, that the deliverability of this growth is a central consideration. The RSS (and emerging local planning documents) must provide a framework to allow for development to take place at the right place and at the right time.

### Conclusion/Proposed Amendment to RSS

- i. Housing numbers for Aylesbury post-2021 should be increased to reflect its Growth Area status and at the very least to reflect, on a pro rata basis, that provisionally assumed in the MKSM strategy i.e. 4250 dwellings in the period 2021-2026;
- ii. Pre-2021 provision should also be increased having regard to evidence submitted to the EiP relevant to the need for increased housing in the south east generally, Aylesbury's ability to accommodate a higher level of growth (as identified by the Roger Tym report), the commitment to achieving a step change in housing supply in the Government's Response to the Barker Review and

- iii. PPS3, the benefits of higher growth to the Aylesbury economy and the ability of large sites, particularly to the south and south west of Aylesbury, to deliver growth sustainably;
- iv. At the very least, the shortfall of 780 dwellings at Aylesbury town from 2001-2006 should be added to the post-2006 RSS requirement;
- v. Reference should be re-instated in the RSS to a broad location for growth to the south of Aylesbury, having regard to the conclusions of the Sub-Regional Steering Group and Aylesbury Vale District Council relevant to the ability of land to the south of the town to accommodate growth and the need, given the delays in the Council's LDF, to provide a strategic planning framework to provide for, if necessary, the release of land to meet housing needs in the short/medium term;
- vi. Stronger reference should be made to the need for sites identified in the LDF to demonstrate deliverability and, in this regard, to recognise the particular benefits of land in single ownership.

**8Fiii.3 What is the justification for the proposed affordable housing target of 40% for Aylesbury town, and how deliverable will it be?**

- 3.1 No submission is made on this issue.

**8Fiii.4 Does the proposed housing provision for the Rest of Aylesbury Vale post 2016 (excluding any growth associated with an expansion of Milton Keynes), provide sufficient allowance for these areas to meet cross border (Leighton Linlade) and local needs?**

- 4.1 No submission is made on this issue.