

Planning Statement

Upper Wellington at Former Marsworth Airfield

May 2023

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Client

Ainscough Strategic Land

Our reference

AINA3004

Introduction

- 1.1 This Planning Statement is submitted on behalf of Ainscough Strategic Land (the Applicant), to accompany the outline planning application for the demolition of existing buildings to enable the delivery of a new village known as Upper Wellington on land at the former Marsworth Airfield.
- 1.2 This Statement relates to the re-submission of an application which was received by Buckinghamshire and Dacorum Councils in June 2022 (Refs: 22/02189/AOP and 22/01678/MOA respectively) but subsequently withdrawn on 27th October 2022. The Project Team has since undertaken a full review of the consultee comments raised during the determination period of the original application and has responded with further assessment information and updates to the application documents contained within this re-submission.
- 1.3 The description of development remains unchanged and comprises:

“Outline Planning permission for demolition of existing buildings, structures and hardstanding to enable the erection of up to 320 residential (Use Class C3), a primary school, a local centre comprising community facilities (Use Class F2) and a rural enterprise hub (Use Class E) together with a transport mobility hub, public open space, drainage, landscaping and ancillary infrastructure. New main vehicular access off Long Marston Road to be determined with all other matters (including other means of access) reserved.”
- 1.4 The site comprises the southern section of Marsworth Airfield which once served as an RAF air base, located approximately 9km west of Aylesbury and 5km north of Tring. An extract of the Site Location Plan, including the application boundary which remains unchanged, is at Figure 1 below.

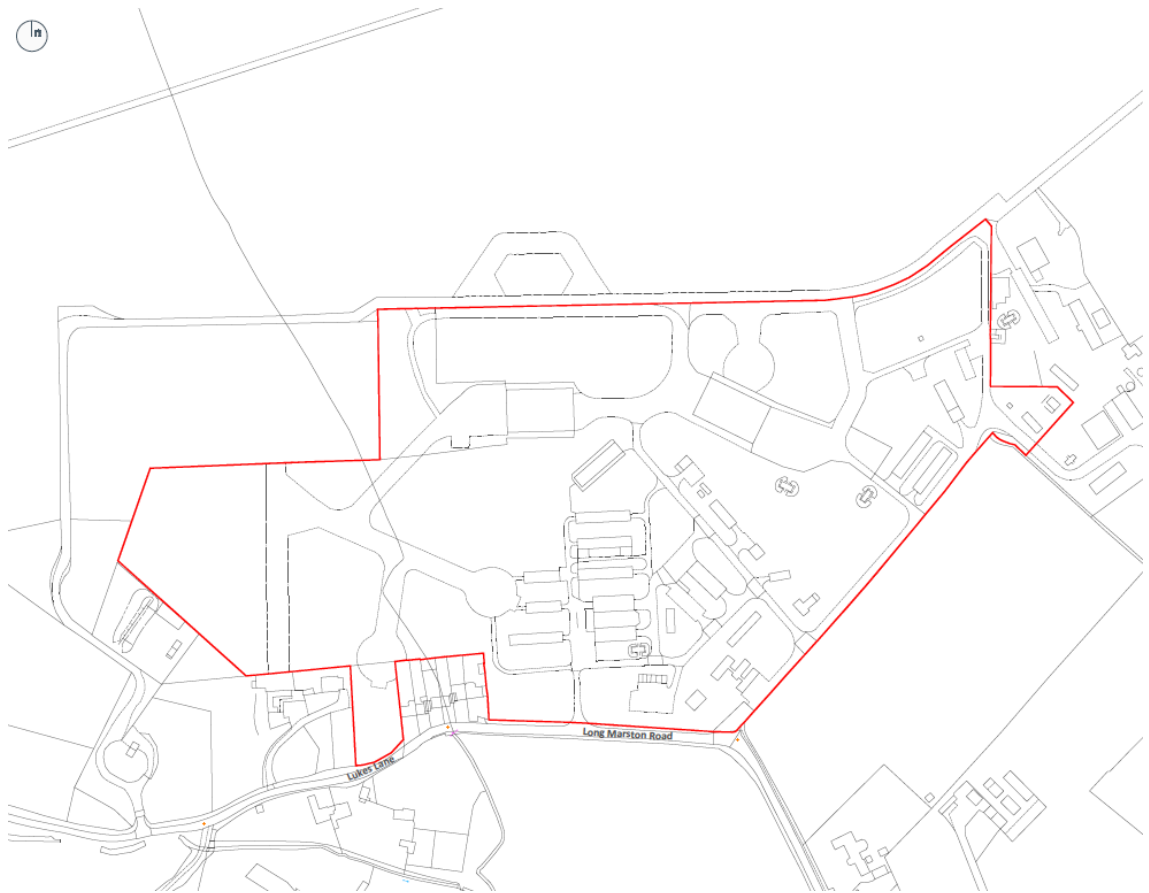


Figure 1: Site Location Plan

- 1.5 The site is located primarily within the boundary of Buckinghamshire Council (Aylesbury Vale area), with the exception of the south-west corner which is located within the boundary of Dacorum Borough Council.
- 1.6 Pre-application engagement, including engagement during the determination period of the original application and subsequent engagement prior to this re-submission, has been wide-ranging to shape and inform the proposals. This included liaison with key stakeholders (such as the Clinical Commissioning Groups (CCG), Local Enterprise Partnerships (LEP), transport providers etc.), both Local Planning Authorities (LPAs) (including technical officers and the Education Authority) and the local community (including with parish Councils) has taken place to shape and inform the proposals. Further information is provided within Section 3 as well as within the supporting Statement of Community Involvement.

Cross Boundary Procedure

- 1.7 The jurisdiction of application site itself, is located primarily within the boundary of Buckinghamshire Council (Aylesbury Vale area), with the exception of the western corner which is located within the boundary of Dacorum Borough Council.

- 1.8 Given the cross boundary nature of the proposed application, two identical applications have been submitted to each LPA, seeking permission for the development of land falling within the respective LPAs administrative area.
- 1.9 The works which fall within each LPA are identified on the submitted plans are identified on Figure 2 below.



Figure 2: Local Planning Authority Boundary Plan – Extent within Buckinghamshire (orange) and the extent within Dacorum Council (Green).

Approach to Cross Boundary Applications

- 1.10 The NPPF identifies fee arrangements for planning applications that cross local planning authority boundaries – This guidance was followed for the original application however, in the instance of this re-submission, guidance in relation to the eligibility of a “free go”¹ is applicable.
- 1.11 This re-submission is made by the same applicant for the same outline development proposals, within the same site boundary and is submitted within 12 months of the original applications being received by the Councils’. Therefore, in accordance with the NPPG, this re-submission benefits from a free-go.
- 1.12 As with the original submission, identical applications have been submitted to each local planning authority, identifying on the plans which part of the site is relevant to each.

¹ Paragraph: 040 Reference ID: 22-040-20141017 Revision date: 17 10 2014

- 1.13 Clearly in the absence of alternative administrative or statutory arrangements, the two planning applications should be determined by the LPA in whose administrative area the development is proposed to be carried out. In the case of cross-boundary applications such as this, this process could lead to the two LPAs making individual determinations, imposing different conditions on the planning permissions and entering into separate Section 106 agreements (if applicable).
- 1.14 Given the above, we request the discharge of functions (application decision making) from Dacorum to Buckinghamshire Council under Part 101 of the Local Government Act 1972, for BCC to be the sole decision maker on the application. This is based on the majority of the works being within BCC's jurisdiction.
- 1.15 National guidance strongly encourages joint working between LPAs in relation to the use of their planning powers. The National Planning Policy Framework (NPPF) advises that LPAs have a duty to cooperate on matters that cross administrative boundaries, particularly those which relate to strategic priorities. In this context, making separate decisions on the proposed works is not recommended as it would fail to promote a coordinated approach to development management.

Submission Structure

- 1.16 A comprehensive suite of updated and additional reports and drawings have been prepared to inform the proposals as follows:

Documents and Reports

- Application Forms
- Covering Letter, prepared by Turley
- Planning Statement, prepared by Turley
- Sustainability and Energy Statement (dated May 2023), prepared by Turley
- Sustainability Infographic, prepared by Turley
- Economic and Social Benefits Statement (dated May 2023), prepared by Turley
- Statement of Community Involvement (dated April 2022), prepared by MPC
- Design and Access Statement (Rev G), prepared by Turley
- Preliminary Arboricultural Impact Assessment (dated April 2023, Ref:13922 R03d), prepared by Tyler Grange
- Arboricultural Impact Assessment Specific to the Offsite Highway Works (dated 16 May 2023 Ref: 13922 R08e), prepared by Tyler Grange
- Ecological Impact Assessment (including Biodiversity Net Gain Metric) prepared by Tyler Grange
- Shadow Habitat Regulations Assessment (dated 2nd March 2023, Ref: 13922 R07a), prepared by Tyler Grange
- Landscape and Visual Appraisal (Ref: edp6433_r001j May 2023), prepared by EDP
- Flood Risk Assessment (Ref 10849 FRA02 Rv1, dated 10.05.23), prepared by Brookbanks
- Archaeological Desk-Based Assessment (Ref: MK0474_2, dated May 2023), prepared by Cotswold Archaeology
- Built Heritage Assessment (Ref: MK0475_1, dated May 2023), prepared by Cotswold Archaeology

- Transport Assessment including Framework Travel Plan (dated May 2023), prepared by Eddisons
- Phase 1 Geoenvironmental Site Assessment (Ref 14-853-R1-6, dated May 2023), prepared by E3P
- Utility Feasibility Report (Rev V4, dated 05.05.23, prepared by TDS
- Noise Assessment (Ref: 12006A-20-R01-04-F dated 10.05.23), prepared by Noise Consultants
- Air Quality Assessment (Ref: J10/12006C/10/1/F3, dated 10 May 2023), prepared by Air Quality Consultants Ltd.

Drawings for Approval

- Site Plan_1002 (1:2500 @A3)
- Access Plan_2497-F04 Rev B (1:1000 @ A3)

Drawings for Illustrative Purposes

- Application Boundary with LPA Area_1004 Rev A (1:2500 @A3)
- Land Budget Plan_2000 Rev C (1:1000 @A1)
- Demolition Plan_1003 Rev A (1:2500 @A3)
- Illustrative Masterplan_3007 Rev F (1:1000 @A1)
- Landscape Strategy Ref: edp6433 d012h (1:1250 @ A1)
- Highways Planting Strategy Ref: edp6433 d01a Sheets 1 to 5 (1:1500 @A3)

1.17 This Planning Statement describes the proposed development for which planning permission is sought, provides explanation of the need for the proposed development and demonstrates the scheme's compliance with national, local policies. Reference is also made to comments raised by stakeholders during the determination period of the original application, including how previous concerns have been addressed.

1.18 This Statement should be read in conjunction with the other supporting documents submitted with this full planning application. The statement is structured as follows:

- **Section 2 (Site Context & Surroundings)** – Provides a summary of the site and its locale.
- **Section 3 (Planning History and Pre-application engagement)** – Provides a summary of the site's planning history and pre-application engagement that has taken place with both Local Planning Authorities, as well as other key stakeholders. This includes liaison and comments made during the determination period of the original application.
- **Section 4 (Proposed Development)** – Provides an overview of proposals including the Applicant's rationale for the provision of the non-residential elements of the development, informed by data analysis and engagement with key stakeholders. This includes the adjustments made to the Illustrative Masterplan in response to consultee comments.

- **Section 5 (Planning Policy – the Development Plan)** – This section concentrates on the key policies contained within the Local Development Plan which relate to the principle of development.
- **Section 6 (Planning Policy – Other Material Considerations)** – Providing a focus on key material considerations, including ministerial statements and other recent Government publications which provide a clear and strong emphasis on the delivery of development on previously developed land.
- **Section 7 (Planning Assessment)** – Assesses the merits of the proposals against relevant local policies, confirming compliance with the Statutory Development Plan and, notwithstanding this compliance, identifies that the titled balance (paragraph 11(d) of the NPPF) is engaged and should be applied to decision taking in light of the Councils’ being unable to demonstrate a five year housing supply.
- **Section 8 (Draft Heads of Terms)** – Provides a summary of affordable provision including the Applicant’s approach to securing delivery of non-residential elements and contributions towards the initial seeding and operation of community facilities. It is intended that this will form the starting point for appropriate S106 negotiations, securing the Applicant’s commitment to providing community provision that will benefit new and existing residents in the locality.
- **Section 9 (Summary and Conclusions)**

Site Context and Surroundings

Site Description

- 2.1 The site comprises an area of approximately 13.72ha, of which approximately 11.11ha is located within Buckinghamshire Council (Aylesbury Vale area) and approximately 2.61ha is located within the administrative area of Dacorum Borough Council.
- 2.2 Vehicular access into the site is currently provided for via a priority controlled junction off Long Marston Road. This provides access to a gated unadopted access road.
- 2.3 The site is located at the southern section of the former Marsworth Airfield, which was previously used as a RAF air base (RAF Cheddington) until 1952. It comprises a number of redundant barracks, hangars and other permanent brick structures which formed the southern camp associated with the RAF air base. A number of the buildings are occupied by workshop and storage type uses with others being vacant and in various states of disrepair.
- 2.4 Vegetation within the site is generally unmanaged and overgrown. The landscape fabric amongst the buildings and hardstanding comprises areas of bare ground, grassland and scrub; scattered broadleaved trees and a coniferous tree line, tall ruderals, and an area of standing water. There is no boundary vegetation defining the northern, western and eastern site boundaries which are open to the adjacent fields. A perimeter fence does run along part of the northern boundary and through the site to the western boundary. The southern boundary is well contained by existing vegetation comprising trees, hedgerows and scrub. A tall mature Leylandii hedgerow runs along the southern boundary adjacent to Long Marston Road forming a dominating and generally uncharacteristic feature in the landscape.
- 2.5 In terms of topography, the site is relatively flat (as a result of its former use) at approximately 95m AOD.
- 2.6 The site has limited constraints as follows:
 - The Site does not incorporate any designated heritage assets, nor does it lie within a Conservation Area.
 - The Site falls within Flood Zone 1, land at least risk of flooding, with the exception of a small section along the eastern boundary (which is not proposed to be developed) which is susceptible to surface water flooding;
 - There are no Tree Preservation Orders or Veteran Trees onsite;
 - The site does not fall within an AONB, Green Belt or any national or local landscape policy designation.
 - The site does not fall within any European, national or locally designated biodiversity designations. It is acknowledged that the site falls within the Zone of Influence of the Chiltern Beechwoods Special Area of Conservation (SAC) and

Ashridge Commons and Woods Site of Special Scientific Interest (SSSI), requiring mitigation from recreational pressure. This has been addressed through the submission of a shadow Habitat Regulations Assessment and securing of Suitable Alternative Natural Greenspace (SANG).

- 2.7 The site constitutes **previously developed land (PDL)** under the National Planning Policy Framework (NPPF). During the determination period of the original application, the sites PDL status was agreed by both Councils.
- 2.8 The south of the site is bound by Long Marston Road and existing residential properties, and agricultural buildings are located to the west. The wider surroundings of the site comprises existing homes and agricultural buildings.

Surrounding Settlements

- 2.9 It should be noted that the site only comprises part of the former Marsworth Airfield site. To the site's immediate north is the former runway and is currently in agricultural use. Beyond is a linear industrial estate located within the northernmost section of the former Airfield, known as the '*Old Airfield Industrial Estate*' or '*Marsworth Airfield North Site*'. This estate is accessed via Cheddington Lane and its planning history includes permission for various storage and industrial uses including a waste transfer station.
- 2.10 The site is located in close proximity to a number of villages including Marsworth approximately 0.9km to the south, Gubblecote 0.3km to the east, Long Marston 2km to the west, and Wilstone 1.1km to the south-east. Marsworth, Long Marston and Wilstone contain a small number of services and facilities including public houses, village halls and primary schools.
- 2.11 Approximately 2km to the north-east lies the village of Cheddington which hosts the nearest railway station with direct rail links to Milton Keynes, Leighton Buzzard, London, and beyond. Approximately 2km to the east lies the village of Pitstone which contains a range of services and facilities. The town of Tring, with a large range of services and facilities, is located approximately 5.5km to the south.
- 2.12 The proposals have been carefully considered in the context of these surrounding settlements, particularly in ensuring the proposed scale of the development is synonymous with nearby villages and including provision of non-residential uses (alongside improved connectivity between the existing and proposed villages) that will benefit new residents and the wider community.

Proximity to Existing Facilities

- 2.13 Paragraph 79 of the NPPF seeks to promote sustainable development in rural areas and identifies that "*where there are groups of smaller settlements, development in one village may support services in a village nearby*". The close proximity of the site to a number of settlements provides the opportunity for the development to create a sustainable community hub that serves both future residents and the surrounding area. The proposals include measures to enhance sustainable transport modes between the

settlements, such as improved pedestrian, cycle, and a bus route diversion into the site.

- 2.14 As well as the intention to provide a number of key services and facilities on site, the site is also located in proximity to the following current services which are within walking or cycling distance:
- **Local Amenities** – Wilstone Village Hall (2km); Marsworth Millennium Hall (1.6km); Red Lion Pub – Marsworth (1.3km); Half Moon - Wilstone Green (1.9km); and Queen's Head, Long Marston (1.6km); Windmill Pharmacy (4.6km); Ivinghoe Post Office (4.7km);
 - **Primary Schools** – Marsworth C of E Infant School (1.6km); Marsworth pre-school (1.9km); and Long Marston Church of England primary School (1.7km);
 - **Secondary School** – Tring School at Mortimer Hill, Tring (5.8km);
 - **GP Surgery** – Rothchilds House Group Surgery, Tring (4km);
- 2.15 The nearest bus stops to the site are located on Tring Road to the west, approximately 770 metres from the site. However, as part of the planning application, carriageway improvements are proposed on Luke's Lane/Long Marston Road to the west of the site as well as bus stop facilities within the site (in the form of a Mobility Hub and inclusion of a road hierarchy that accommodates a succinct circular bus route). These improvements will enable bus services to access the site safely and efficiently and will ensure all residents are located within 400 metres of a bus route.
- 2.16 Positive engagement with the local bus operator (Red Eagle Buses Ltd) confirms that the existing bus service No.62/62A (which currently operates between Aylesbury town centre, Tring, Pitstone and Long Marston) can be extended into the site and will increase in frequency to enable commuter trips by bus – See Transport Statement for further information. To support the re-submission the Applicant has re-engaged with the bus operator who confirms that its position of extending the route within the site remains unchanged. This extended bus route will provide tangible benefits for residents within Tring, Pitstone and Long Marston.
- 2.17 The nearest train station to the site is Cheddington (5.4km from site), which is serviced by London Midland trains that operate along the West Coast Mainline that connects London Euston with Milton Keynes. There is the opportunity for future residents to access the train station by cycling or utilising the services within the proposed Mobility Hub.

Landscape Context

- 2.18 The nearest national landscape designation to the site is the Chilterns AONB c.1.3km to the south-east.
- 2.19 The site lies within c.700m of Local Landscape Area (LLA) Westend Hill and Southend Hill, noted to *'rise prominently out of the surrounding flat landscape, forming an interesting and distinctive feature.'*

- 2.20 There are two 'Areas of Attractive Landscape' within 5km of the site. The first to the east of the site, known as AAL 5: Ivinghoe and *"comprises three small areas of landscape at the lower escarpment of the Chilterns AONB foothills"*. The second is to the north-west known as AAL 3: Quainton – Wing Hills and is formed of *"undulating hills and ridges with distant panoramic views across the strongly rural and picturesque landscape, including the Vale of Aylesbury to the south"*.
- 2.21 There are no Public Rights of Way running through the site, however public footpath MAR/17/1 connects the site's south-east boundary to Long Marston Road.
- 2.22 There are several promoted routes within the detailed study area from which views of the site may be possible. These include the Icknield Way Trail, Grand Union Canal Walk, Outer Aylesbury Ring, Aylesbury Ring and Ridgeway.
- 2.23 Public footpath MAR/6/1 lies approximately 500m to the east of the site. The route connects routes along the Grand Union Canal (MAR/15/3 and 15/4) in a northerly direction to the High Street leading into Cheddington. There are westerly views from this route across the site and wider airfield.
- 2.24 Public footpath CHD/3/2 and MAR/19/1 extend out of Cheddington in a southerly direction and then turn west to join Cheddington Lane. There are southerly views from this route across the site, wider airfield and towards the settlement edge of Marsworth.

Heritage Context

- 2.25 A built heritage assessment has been carried out on the buildings and structures contained within the site itself to establish their heritage significance in the context of the site's former use as an airfield.
- 2.26 The assessment concludes that many of the buildings are in various states of disrepair. As such, the Site does not incorporate any designated heritage assets, nor does it lie within a Conservation Area. During consultation on the original application, the Conservation Officers' raised no objection to the demolition of the buildings and structures onsite, subject to a planning condition requiring a historic record to be carried out prior to demolition.
- 2.27 Marsworth Conservation Area is situated approximately 450m to the east, however, there is no intervisibility between the Site and Conservation Area and the Site is not considered to contribute to the significance of the Conservation Area via setting.
- 2.28 The nearest designated heritage assets include is 'A small multivallate hillfort on Southend Hill' scheduled monument which is c.900m to the north-east of the site.

Planning History

Historic Planning Applications

- 3.1 The site has been subject to two historic outline applications for residential development. The first application (89/01297/AOP) was submitted in 1989 and proposed 155 dwellings. The application was refused on 31st August 1989.
- 3.2 The second application (Ref: 94/00041/AOP Aylesbury Vale Ref: 4/1684/93/FL Dacorum) was submitted in 1994 and proposed 100 dwellings. The application was refused on 29th July 1996, with a subsequent appeal (Ref: APP/J0405/A/95/252761) dismissed. The decision was upheld by the Secretary of State on 6th August 1996 with refusal reasons relating to the impact of the development on the rural character of the area and on the environment, and that the development would conflict with the principles of sustainable development due to the reliance on the private motor vehicle. The Secretary of State commented that:

“...the Secretary of State agrees with the Inspector that the need to identify additional sites is not so pressing as to justify the use of the appeal site for housing purposes.”

“The Secretary of state recognises that benefits would accrue from the proposal. These include the re-use of a redundant, rather than a “greenfield” site, the improvement of the site by the removal of derelict structures and the removal of possible contamination, the provision of affordable housing and the provision of open space.”

- 3.3 While the Secretary of State (SoS) considered at the time that there was no need for the development, he recognised that there are a number of accrued benefits to proposals to redevelop the derelict site. A copy of the SoS decision is provided at **Appendix 1**. It should be noted that the policy context has evolved significantly since this decision, with a different housing need context and a strengthened support for redevelopment of brownfield land which the current proposals will be assessed against.
- 3.4 The site has also been subject to a number of commercial applications and appeals including (but not limited to) planning application reference 15/00374/APP for the change of use and refurbishment of existing retained buildings from agricultural storage and to B1 (Business) use. It should be noted that no highway improvements were proposed along Long Marston Road and as such, the application was refused in July 2019 on highway grounds due to the additional vehicle movements along inadequate sections of Highway by reason of its width, alignment, visibility and construction resulting in highway safety risks. The application directly addresses these concerns with proposed highway improvements described in Section 4.
- 3.5 Other Planning History of relevance to the site is provided at **Appendix 2**. This includes identification of the existing lawful uses onsite to gain an understanding of likely existing vehicle movements. This is considered further within the Transport Assessment.

Pre-application Engagement (Prior to Submission of the Original Application(s))

Pre-application April 2018

- 3.6 A pre-application request was submitted to Aylesbury Vale District Council by Turley on 11th April 2018, for the proposed residential-led development of the site. The pre-application proposed approximately 300 homes, a local centre and a rural enterprise hub.
- 3.7 A written pre-application response was received from Aylesbury Vale District Council on the 25th April 2019 and a meeting was held with the Council. However, it is fair to record that there was little Officer engagement with the merits of the proposed development at the time. The applicant submitted a second, more detailed, pre-application in September 2021 which comprised a suite of draft reports to demonstrate the suitability of proposals and its overall planning merits.
- 3.8 The Council's written pre-application response primarily considered the principle of mixed-use residential development on the site. Comments from consultees including ecology, parks and recreation, affordable housing, and Buckinghamshire County Council education were also received.
- 3.9 The Council acknowledged that as a former airfield the site constitutes a brownfield site, and that there is the potential for some environmental enhancement as a result of residential development. This would need to be balanced against any visual impact.
- 3.10 The Council also commented that the sustainability of the site was a key consideration.

Pre-application September 2021

- 3.11 A second pre-application was submitted in September 2021. This comprised a full suite of draft application documents and plans, including (but not limited to) detail on Ecology, Landscape and Trees, Flood & Drainage, Utility Feasibility, Highway, Design and Access, Economics Benefit and Sustainability.
- 3.12 Meetings with Officers' were held and are summarised as follows:
- **Virtual Meeting on 23rd September 2021** with the Dacorum Borough Council Planning Officer (Robert Freeman). General matters and queries were discussed regarding infrastructure provision, housing mix in the context of a cross boundary application, land ownership and planning status, including the planning history of the Gubblecote scheme to the West of the Site along Lukes Lane comprising a housing development for 26no. homes on a former agricultural site.
 - **Virtual Meeting on 29th October 2021** with Buckinghamshire Council Planning Officers and Highway Authority (Sarah Armstrong, Zenab Hearn and David Marsh respectively). Concern was raised regarding the principle of development, including if the site falls within the definition of brownfield (later confirmed in the Council's written advice that there is an argument for it being defined as such). Reference was made to the aforementioned appeals and the highway concerns raised by the Inspector(s). There was little Officer engagement with the

merits of the proposed development or discussion on the scope of the draft technical assessments.

- **Virtual Meeting 1st November with 2021** with planning officers from Buckinghamshire Council and Dacorum Council (Zenab Hearn and Robert Freeman, respectively) and Jonathan Bellars (Buckinghamshire Landscape Officer). General sustainability concerns were raised in relation to the feasibility of the non-residential aspects of the development, with further detail sought as part of any planning application regarding the Applicant's approach to the delivery and funding of these aspects of development. Subsequent to the meeting, advice was provided by the Landscape Officer regarding the scope of the Landscape and Visual Impact Assessment.

3.13 A short pre-application response was issued by Buckinghamshire Council on 9th November 2021. The response focuses on the principle of development and can be summarised as follows (with some commentary provided where relevant):

- While the Council notes there is an argument that the site is previously developed land, it objects to the principle of the development in the context of it being located 1km from Marsworth village which it considers to be an unsuitable location for development. This is in respect of Policy S7 of the VALP which encourages the reuse of previously developed land in sustainable locations.

Applicant Response – *The Council, in assessing the location in relation to Marsworth and concluding it to be unsustainable, have not understood the proposals. It is not an extension to Marsworth but instead a free standing new village which in itself will be sustainable. Sustainability has been the primary consideration in the Applicant's preparation of the application. The submission is supported by a Transport Assessment, prepared by Eddisons which sets out why the location is considered suitable for development in terms of its accessibility to existing services and facilities within the locale. Key measures (described in Section 4) are proposed as part of the development to further improve the sites accessibility via sustainable transport modes. Furthermore, the submission is supported by reports which - when read as a whole - demonstrate that the development will deliver economic, social and environmental benefits, therefore fulfilling the three strands of what constitutes a sustainable development, in accordance with national policy.*

- A Viability Assessment should be submitted with any planning application due to the Council's concern that the development would be unable to provide a policy compliant level of affordable housing in conjunction with a new school and associated infrastructure works.

Applicant Response – *Information relating to the cost and feasibility of the proposals has been gathered by the Applicant to inform its own internal viability exercise. Development costs have been identified to assist this exercise, including the utility feasibility study (setting out utility connection costs and upgrades); identification of transport highway improvements and operating costs towards the provision of sustainable transport infrastructure. Furthermore, a scoping exercise was carried out within the early stages of the schemes design evolution*

to ascertain the feasibility and appropriate quantum of non-residential development onsite. This document includes a draft Heads of Terms with the intention to deliver a policy compliant level of affordable housing. As such, it is not considered necessary to submit a viability assessment and one is not required by national planning policy.

Applicant Response in the context of the re-submission – The Applicant has continued to gather information to inform its internal viability exercise, including updated costs associated with the infrastructure and services for the development that have been subject to change from macroeconomic factors.

- The highway serving the site is inadequate by reason of its width, lack of continuous footways, restricted forward visibility in the vicinity of the canal at Marsworth to serve the development with safety and convenience. Therefore, the Council is of the view that residents within the development would be reliant on cars to travel to/from the site and result in unacceptable intensification of traffic turning movements at the junction between B489 and Vicarage Road.

Applicant Response – Since the pre-application submission, further work has been undertaken to ensure the suitability of the access proposals for the site. The proposals include carriageway improvements along the length of Long Marston Road and provides connections to the existing footway to provide a safe walking route to nearby villages. Furthermore, a Mobility Hub is an integral part of the proposals which will provide alternative modes of transport for residents, including by bus or e-bicycle. See Section 4 and supporting Transport Statement for more information.

Applicant Response in the context of the re-submission – Further assessment and adjustments to the proposed offsite highway works have been made – Full detail is provided in Section 4. One of the key adjustments is inclusion of a signalised junction over the canal to enhance the safety of pedestrians in response to comments raised by the Highways Authority.

Other Stakeholder Consultations (Prior to Submission of the Original Application(s))

- 3.14 Taking on board the pre-application comments received from Buckinghamshire Local Planning Authority in September 2021, the Applicant has engaged with numerous bodies to inform the proposals, understand the costs associated with the delivery of (and potential contributions towards the operation of) the community buildings and understand the requirements of stakeholder to ascertain the likely level of occupier interest. This has included liaison with the following bodies:

- The Local Education Authority;
- NHS Clinical Commissioning Groups;
- Representatives of business Groups, such as Bucks Business First;
- Local bus service (Red Eagle Buses Ltd) and car club (CoWheels) providers – see supporting Transport Assessment; and

- Marsworth and Tring Parish Councils - see supporting Statement of Community Engagement for further information.
- 3.15 Meetings with Buckinghamshire Education Authority have assisted to understand educational capacity within existing schools, identify the likely pupil yield arising from the development, including opportunities for onsite provision as part of the development. This positive engagement has led to the inclusion of a 0.5FE school onsite to accommodate the pupil yield arising from the scheme, with sufficient space to enable its expansion to 1FE to accommodate any future need arising from nearby villages.
- 3.16 Engagement with the CCGs was sought to ascertain if there was any appetite for a satellite GP surgery to be provided onsite. No response has been received from the CCG to date and as such, reference to this as a potential onsite service onsite is less emphasised within the application documents. However, by virtue of medical and health services now falling within Use Class E, alongside other financial, sport, employment and retail services, there is opportunity for this provision to be included at detailed design stage should the CCG express an interest at a later date.
- 3.17 A positive meeting with Bucks Business First was held and has been key to the illustrative design of the rural enterprise hub which is now integrated within the local centre alongside the community/meeting space. BBF confirmed there is high demand for small units in the locality, with particular interest arising from those within the local food supply chain. As such, BBF was supportive of the proposed commercial uses onsite.
- 3.18 For full details, see the Stakeholder Consultations Briefing Note at **Appendix 3**.

Environmental Impacts Assessment (Refs: 21/03633/INF1 and 21/03403/SCE)

- 3.19 An EIA screening opinion was sought from both LPAs on 2nd September 2021. Separate opinions were issued by the Councils with both being of the opinion that an EIA is not necessary on the basis that the proposals would not likely lead to a significant impact to the environment, in accordance with the three criteria set out in Schedule 3 of the Regulations. A copy of each Screening Opinion is provided at **Appendix 4 and 5**.
- 3.20 These previous screening opinions remain appropriate as there are no changes to the development that would materially affect the conclusion that no significant environmental effects would arise.

Consultation Responses during Determination of Original Application(s) and Prior to Re-Submission

- 3.21 The Original Applications were submitted in May 2022 and during the determination period consultation comments were received from statutory consultees and local residents.
- 3.22 A summary of the statutory consultee comments, including reference to where within the re-submission documents comments have been addressed, is provided at **Appendix 6**.

- 3.23 A summary of the key themes arising from public comments, including the Applicant's response to these is provided at **Appendix 7.**
- 3.24 The Applicant has sought to engage with key stakeholders to inform the re-submission. This includes:
- 3.24.1 **Meeting held with Bucks Business First** held in October 2022 – Discussion was centred around the Applicant's consideration of moving the Rural Enterprise Hub to the proposed site access and the benefits this could have in terms of drawing business in. Whilst BBF acknowledged the (negative) responses received from the public during consultation but confirmed its position remains unchanged (see Paragraph 3.17 above).
 - 3.24.2 **Liaison with Car Club and Bus Operators** – Providing an update to their position in relation to their offer and costs for services within the site. This has informed the Transport Assessment and Travel Plan.
 - 3.24.3 **Engagement with Local Education Authority** – A meeting was sought by the Applicant in April 2023 with the LEA to discuss the updated Illustrative Layout and the benefits associated with locating the Multi-Use Games Area (MUGA) within the school expansion land. To date no response has been received.

Proposed Development

- 4.1 The Applicant is committed to the delivery of a sustainable new community and has focused its sustainability strategy on meeting and (where possible) exceeding the targets present in the adopted Aylesbury Vale local plan.
- 4.2 The Town and Country Planning Association (TCPA) have published guidance that discusses the concept of a 20 Minute Neighbourhood (March 2021). It sets out the principles of how well we should plan, design and create new places and regenerate (and utilise) existing ones. It identifies a range of issues including health inequalities, climate change, and the decline in local high streets and economies and identifies measures to address these, including a checklist to consider during the design of a development. The unique context of this site provides exactly this opportunity: to draw on, and sustain use of, existing facilities, while offering the provision of new spaces and services to provide for the new and existing community.

Overview of Proposals

- 4.3 The proposed development would include the demolition of the majority of existing buildings and structures (which are in various states of disrepair), and the decontamination of the site as necessary.
- 4.4 The site would then be redeveloped to provide a mix of uses including:
- **Up to 320 homes (7.9ha)** – comprising a mix of housing types and sizes, including First Homes, traditional affordable housing tenures and opportunity for self build homes. A range of densities (30-45dph) will be achieved across the site with higher densities near the local centre and lower densities along the development edge.
 - **A 0.5 Form Entry (FE) primary school with playing field and a Multi Use Games Area (0.5 ha with potential expansion to 1 FE on 1.1ha)** – the size of the school has been informed by positive engagement with Buckinghamshire Education Authority and space has been provided to enable the school's expansion to 1FE, should this be needed to account future growth arising from nearby villages. It is intended for the playing field and MUGA to be accessible to the local community outside school hours.
 - **Community Centre and Rural Enterprise Hub (0.39ha)** – providing facilities (within Use Classes E and F) such as:
 - A **community shop** (approximately 190 sq m)
 - **Community and meeting space**, which could be used for meetings or visiting surgeries and leisure, community, or sports classes in the morning/evenings/weekends (approximately 240 sq m)
 - **Café/services/business units** (approximately 180 sq m)

- **Mobility Hub** – This will be designed specifically to house public and shared mobility modes (including bus stops, car club and E-bike provision), providing for and encouraging the use of more sustainable travel choices for onward journeys.
- **Rural enterprise hub** – approximately 940 sq m providing commercial units for small enterprises (such as food supply chain businesses linked to the local agriculture) and local employment opportunities
- **Public open space (4.33ha) and landscaping** – including 800sq m of equipped play areas, a community orchard, a community courtyard garden and a ‘trim trail’/footpaths throughout. Biodiversity and landscape enhancements are integral to the site’s green infrastructure and includes (inter alia) wildflower grassland, native scrub and wet ponds.
- **Access and Movement** – including the creation of a foot/cycle path network throughout the site which connects to both the existing Public Right of Way to the east of the site, and Long Marston Road to the south. A new vehicular access is proposed onto Long Marston Road where good forward visibility can be achieved. A Stage 1 Safety Audit has been undertaken to inform the proposed access. Highway improvements are also proposed to Long Marston Road, which will include connection to and widening of existing footways and widening of the carriageway; and diversion of an existing bus service into the site.
- **Sustainable Urban Drainage Systems (SuDS)** comprising a network of swales and drainage ponds (which will remain wet in part to enhance wildlife and amenity) including the opening up of an existing culvert within the eastern section of the site into an open swale.

4.5 The submitted Illustrative Masterplan demonstrates how these uses could be spatially accommodated on the site, and the submitted comprehensive pack of technical reports provide technical details.

Landscape Strategy

4.6 The site offers a positive and logical location for a new settlement with significant opportunities for enhancements to the landscape fabric. The LVA includes a landscape strategy which illustrates the proposed landscape mitigation and improvement measures. These are summarised as follows:

- Retention of existing boundary vegetation which contribute to the landscape fabric;
- Increased tree cover and establishment of new woodland buffers around the site boundaries to connect existing habitats and define the currently open northern boundary;
- Infilling and replanting of hedgerow (creating c.+292.17% in terms of net additional hedgerow units);

- Multi-functional green corridors and community greens amongst the development parcels to break up the massing of development and provide residential amenity;
- Habitat Creation and ecological enhancements (such as wild flower grassland, wet SuDs ponds and native scrub) to achieve a biodiversity net gain onsite (+10.02%)
- Cultural and historical features (such as the former blast shelters) would be retained and enhanced within the site's public open space (e.g. via a heritage trail) to reinforce the association of any development within the site with its former use;
- Landscape features that promote community cohesion and promote growing of fruit and vegetable such as an orchard and community garden.

Carriageway and Footpath Improvements

- 4.7 A proposed new access is located along Long Marston Road, at a location where good forward visibility can be achieved. The proposed access arrangements are shown on the Proposed Highway Improvement Plan (Drg No. 2497-F03 Rev I). This has been informed by a Stage Road Safety Audit and includes reducing the speed limit at this location to 30mph. Only the main access from Long Marston Road is proposed to be determined at this outline planning application stage, with all other means of access, including internal access, reserved for future determination.
- 4.8 To facilitate safe pedestrian movements to and from Marsworth village a new section of footpath (2m wide) and improvements to the existing pedestrian infrastructure on Long Marston Road and Vicarage Road are proposed. This will provide a continuous footpath that has street lighting and is a minimum width of 1.5m (with the exception of a small pinch point nr No.76 Vicarage Road where footway width will reduce to 0.9m). The existing Canal bridge along Vicarage Road has no pedestrian provision however the proposals include signalised junction and a 1m coloured surface for pedestrians. The inclusion of a signalised junction is following comments received from the Highways Authority during consultation on the original application. The proposals will provide a substantial improvement to the existing situation.
- 4.9 Carriageway widening is proposed on Long Marston Lane/Luke's Lane for a length of 710m. This will provide a carriageway width of 6m and will remove existing pinch points which currently prevent two-way vehicle movements. The proposed width is more than sufficient to enable a HGV and car pass safely. A priority give-way arrangement will be introduced near properties No. 7 and 8 Luke's Lane to ensure forward visibility can be achieved while retaining access to these properties on the northern side of Luke's Lane.
- 4.10 It should be noted that the proposed offsite highway works have been carefully considered alongside existing vegetation situated along the highway. Bespoke measures include a priority junction opposite 12 Lukes Lane that will avoid the removal of a number of Category A Hybrid Black Poplar trees and relocation of the indicative street lighting columns, ensuring they are located outside of root protection zones.

Where any existing vegetation is proposed to be removed to facilitate the carriageway and footpath improvements, this has been taken into consideration within the Application's Biodiversity Net Gain calculations and a Landscape Strategy has been prepared to establish suitable locations along the verge where new planting can be delivered.

- 4.11 The proposed improvement scheme presents a substantial improvement for existing road users and pedestrians. The proposed arrangements are similar to those implemented elsewhere on the local highway network and enable a bus to safely travel along Luke's Lane to/from the application site.

Sustainable Transport Measures

- 4.12 In addition to the footway improvements above, the following measures are proposed to promote sustainable travel to/from the site:

- **Diversion of Existing Bus Service into the Site** – The highway improvement works described above will enable bus service No.62/62A (operated by Red Eagle Buses Ltd.) to enter into the site itself. This will ensure all new residents are located within 400m of a bus route that provides links to Aylesbury town centre, Tring, Pitstone and Long Marston. As part of the proposed extension an additional weekday journey departing from Aylesbury Bus Station will be provided to further enable commuter trips by bus. During the week, this service will run between 07:35 and 18:00 on a half hourly basis and on an hourly basis between 08:00 and 17:00 on Saturday. Funding is committed by the developer to enable this extension as will be secured through the Framework Travel Plan and/or S106 Agreement for the site.
- **Provision of a Mobility Hub within the Local Centre** - Designed specifically to house public and shared mobility modes, including bus stops, car club, parcel lockers where goods can be delivered and facilities to hire bicycles and/or e-bicycle/e-scooters.
- **Implementation of a Travel Plan** – A Framework Travel Plan (appendix 4 of the Transport Assessment) identifies awareness and management measures to encourage residents and visitors to use alternative to the private car.

Proposed Onsite Community and Employment Uses

- 4.13 The proposed mix of uses will create a sustainable community which serves both future residents and the surrounding wider community.
- 4.14 During the design evolution of the development, the Applicant carried out a sustainability scoping exercise. This included analysis of the local population and business context (a Map of the study area is provided at **Appendix 8**) to inform the sustainable provision and appropriate quantum of non-residential forms of development onsite.
- 4.15 The scoping exercise assisted to establish where there is local demand for particular facilities and has tailored the type of community and business space provided onsite to

ensure these elements of development are feasibly operational. Furthermore, the applicant has engaged with local stakeholders including representatives from business groups to gather further advice and evidence on its approach to the local centre and uses within it (see Section 3).

Rural Enterprise Hub

4.16 Whilst the site is not a formal employment site (and as such is not protected by Policy E2) commercial uses are in operation. It is the Applicant's intention to improve employment opportunities within the local area through the provision of the Rural Enterprise Hub (REH), aimed at small/start-up and rural businesses. This is supported by Bucks Business First. Provision of the REH in conjunction with other uses within the Local Centre will provide an attractive working environment with opportunities for café-style working and space to hold meetings.

4.17 The findings from the Applicant's sustainability scoping and stakeholder consultation which support this provision can be summarised as follows:

- The total estimated resident population of the local study area was circa 14,900 in 2018. Of those who are in employment, 77.8% work for companies while 22.2% are self-employed. The proportion of those who own their own businesses and are self-employed is higher compared to the national average (16.2%) which is an important note of comparison.
- In terms of businesses operating in the local area, there is a total of 1,750 businesses located in the villages surrounding the site. The majority are rural in nature comprising small to medium sized enterprises.
- There is a higher than the average number of homeworkers in the immediate villages surrounding the site who could benefit from bespoke, small format office or meeting space. Office or meeting space could help to serve this community of self-employed residents who are looking to expand their businesses.
- There is a good level of provision of co-working space in Aylesbury, which demonstrates that there is a local demand from businesses and start-ups. However, consultation with BBF noted that the highest demand is for small industrial units for trades (such as those relating to the local food supply chain and agriculture), rather than shared office space.
- Bucks Business First (BBF) indicates that the location would receive interest from small enterprises, given the site's proximity to Cheddington Railway station and the proposed mobility hub. As such, BBF has confirmed through our meeting with them that they would support the scheme.

Social Infrastructure

Health

4.18 To ascertain what appropriate provision onsite, an analysis of existing social infrastructure provision was carried out. It noted that GP facilities are oversubscribed but based on local policy and guidance from NHS England, new facilities will only be

considered within a new development when the population demand arising from the development is 10,000.

- 4.19 Given the likely population arising from the development (c.780), a new GP surgery to serve the development itself would not be feasible. However, given existing GPs are oversubscribed, it was considered possible that there may be sufficient demand to enable a new practice to be delivered on site at a scale required by the CCG. Consultation with the CCGs took place prior to submission of the original application to explore if this would be something of interest, however, no response was ever provided.
- 4.20 During the consultation period of the original application a response was provided by Hertfordshire and West Essex Integrated Care Board which acknowledged existing premises constraints but sought S.106 contributions towards the expansion, reconfiguration and possible relocation of existing clinical space. While it remains that there is scope for such facilities (under Use Class E) to be provided onsite, in the absence of any known interest from the CCG and Health Board, it is assumed that developer contributions (which the Health Board calculates to be £413,440 based on 320 homes) are to be made towards the expansion of existing facilities which is proportionate. This is included within the Applicant's Draft Heads of Terms.

Sports Facilities and Open Space

Indoor Facilities

- 4.21 A review of Aylesbury Vale's Council(s) Assessment of Open Space, Sports and Recreation Needs (2017) identified that the combined anticipated population growth for the district's larger, medium and smaller villages between 2016 and 2033 is just over 8,000 people. This would lead to the need for an additional 2.24 badminton courts but notes that due to the geographical spread of the area, provision in any one location would be difficult to justify. Instead, focus should be concentrated on ensuring local community centres have adequate lower level facilities.
- 4.22 In accordance with this assessment, the proposal incorporates a multifunctional community building within the local centre that can be used for indoor sports. It is understood that contributions may be sought towards other offsite indoor leisure provision. The contribution sought will be proportionate to the development and take into consideration the provision that is to be secured onsite.

Outdoor Facilities

- 4.23 Comments received from the Parks & Recreation Officer during consultation of the original application identified Buckinghamshire's starting point for onsite public open space provision for a development of this scale. Based on requirements 0.96ha of Major Open Space; 1.12ha of Incidental open Space; an equipped area of play and a Multi-Use Games Area (0.1ha in size) should be provided onsite, with contributions to be discussed with the Council in relation to offsite leisure provision (to be discussed on a project by project basis, depending on the extent of onsite POS provision).
- 4.24 Overall, the site proposes 4.33ha of Public Open Space. This is a multi-functional space, providing landscape, drainage, and ecological enhancements with c.3.5ha proposed for

recreational space. The table below (extracted from the Design and Access Statement) demonstrates how the proposals meet these the Council's POS requirements:

Public Open Space	Policy Requirement (ha/1000 residents)	Site Requirement*	Proposed
Major Open Space - Parks, Formal Gardens & Public Open Space, excluding drainage	1.2ha	0.96ha	2.08ha
Incidental Open Space - Amenity/landscape planted areas, excluding drainage	1.4ha	1.12ha	1.12ha
Equipped Designated Play Areas	0.25ha	0.2ha	0.33ha**
MUGA	0.1ha	0.1ha	

* The following area requirements have been calculated on the basis of 320 homes with an average household size of 2.5 leading to an estimated 800 residents

** This is made up of a 0.08ha LEAP and a 2.5km walking route which will provide areas of linear trim trail such as natural play and outdoor gym spaces.

4.25 Officer comments request that a MUGA and a Neighbourhood Area of Play (NEAP), alongside the Locally Equipped Area of Play (LEAP) are to be provided onsite. This has been taken into consideration and the updated Illustrative Layout now identifies a MUGA (+30m buffer) within the expansion area to be allocated for the Primary School.

4.26 This is a sensible location for a MUGA, noting that a hard surface playground would be needed for the school. From a review of the Department of Education guidelines, a 1FE school would need to provide 0.07ha of hard outdoor PE space so the location of a 0.1ha MUGA (to be delivered by the developer) within the school expansion area would be of benefit. This would offer a larger all-weather surface for pupils to play during school hours and through the provision of a simple gate locking/opening system (managed by the school caretaker), the MUGA could be made accessible for the community to use outside of school hours.

4.27 A bespoke approach has been applied to play provision to maximise use of the 'Green fingers' that connect through the site. This includes a 0.08ha LEAP (+ 20m buffer) within the northern area of green infrastructure and a 2.5km trim trail/walking route that interlinks through the site. Along this route there are a number of locations where outdoor gym equipment could be located, alongside natural play. In addition to the MUGA, this is considered to be an appropriate response to the landscape led layout whilst ensuring there is play provision for older children (who would traditionally be served by a NEAP).

4.28 It is noted from the Fields in Trust Guidance that development of this scale (between 201-500 dwellings), would typically make financial contributions towards a Neighbourhood Area of Play (rather than onsite provision). This indicates scope for flexibility in onsite provision and suitability of the bespoke approach described above, alongside a financial contribution, in accordance with Council policies, towards provision towards other offsite facilities.

Community Shop

4.29 A review of existing shopping patterns indicates that Tring and Aylesbury are popular destinations for convenience food shopping for residents living within the Marsworth

area. Residents of the proposed development are likely to continue this pattern however, many may choose to undertake their grocery shopping online which is likely to be sourced from supermarkets in the same locations, further afield. The assessment notes that the development would support new retail floorspace equivalent to the size of a small convenience store and as such, a community store is proposed.

- 4.30 The proposed size of the community shop is typical of a convenience store that would serve a traditional village although it is noted that there is no such existing provision within nearby villages, Long Marston and Marsworth. Therefore, the proposals present an opportunity to provide a facility that will be accessible to both new and existing residents. This benefit is reflective of paragraph 79 of the NPPF which seeks to promote sustainable development in rural areas and identifies that *“where there are groups of smaller settlements, development in one village may support services in a village nearby”*.

Sustainability Credentials

- 4.31 The Applicant is committed to the delivery of a sustainable new development and has focused its sustainability strategy on meeting and (where possible) exceeding the targets present in the adopted Aylesbury Vale local plan. The supporting Sustainability and Energy Statement sets out how proposals respond positively the three pillars of sustainability and sets out a number of measures summarised as follows.
- 4.32 From an economic perspective, there are numerous benefits associated with the construction and operation of the development. During construction these include supporting **80 gross FTE jobs** each year and generating **£51 million** Gross Value Added (GVA) contribution to the economy over the 5-year construction period.
- 4.33 When the development is fully occupied the economic benefits include (inter alia) a gross resident income of **£12 million**, increasing local spending power; Household expenditure on convenience and comparison retail goods and leisure goods and services equating to a combined **£9.1 million** per annum, this having the capacity to support 85 jobs in the retail and leisure sectors; **55 gross FTE jobs** supported on site via the operation of the Primary School, Local Centre and Rural Enterprise Hub.
- 4.34 From a social perspective, the proposed open space will incorporate parks, play areas, a Multi Use Games Area, community gardens and a network of paths that will promote mental and physical wellbeing by providing psychological relaxation/stress alleviation, opportunities for people to meet and converse, stimulating social cohesion. This is further enhanced with the proposed community facilities within the Local Centre, providing opportunities to socialise and exercise and host community events.
- 4.35 From an environmental perspective and in terms of accessibility, the development will reduce the need to travel by car by virtue of the developments proposed mixed-use, providing a range of community, education, sport and commercial facilities and services for new and existing residents.
- 4.36 For onward journeys, the proposals promote sustainable transport options through the inclusion of a Mobility Hub including a rerouted and extended bus service into the site; delivery of highway and footway improvements along the Long Marston Road, linking

to nearby villages; implementation of an exemplar Travel Plan and a high proportion of electric vehicle charging points.

- 4.37 Ecological enhancement measures are incorporated throughout the site, including site SuDS (which are to be maintained as wet features) and different forms of habitat creation, resulting in a **biodiversity net gain of 10%**.
- 4.38 As a minimum the new homes will achieve the Interim Future Homes Standard which is circa **31% CO2 improvement** on the current Part L 2013 Building Regulations.
- 4.39 An Embodied Carbon Assessment of the construction carbon emissions of the development will be completed. The Applicant will target a reduction in carbon emissions through a range of material efficiency measures such as use of recycled and low carbon materials.
- 4.40 The energy strategy for the development is to use low carbon technologies (alternative to gas) to supply heat. Use of Air Source Heat Pumps (ASHPs) is considered the most practical, cost effective and low risk solution for the development. It is expected that the use of ASHP as proposed is likely to result in a **30-40% proportion of energy demand from renewables**.

Planning Policy – the Development Plan

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”

5.2 The site is situated in both the Vale of Aylesbury and Dacorum Council districts so the current ‘Development Plan’ for the site consists of the:

- Vale of Aylesbury Local Plan (2013-2033), adopted September 2021
- Dacorum Core Strategy (2006-2031), adopted Sept 2013
- Dacorum Site Allocations Development Plan, adopted July 2017.

5.3 Whilst the Development Plan is the starting point for making determinations under the Planning Acts, other up to date material considerations may also be relevant.

Vale of Aylesbury Local Plan (2013-2033)

5.4 The Vale of Aylesbury Local Plan was adopted 15th September 2021. This document sets out the vision and strategic context for accommodating and managing growth in the area of Aylesbury Vale until 2033.

5.5 This plan indicates protected areas, areas where development will take place and outlines policies which determine the outcome of planning applications.

5.6 A summary of relevant policies is provided at **Appendix 9**, however, the most important policies are summarised below.

5.7 Starting with the ‘Objectives’ of the Plan, the first Objective in Aylesbury is as follows:

*“Provision will be made for balanced sustainable growth which will deliver new housing and jobs to meet the needs of new and existing residents through a flexible and pro-active approach to promoting sustainable development which includes a combination of new allocations, protection of existing sites, **redevelopment of previously developed land** and a more intensive use or conversion of existing sites.*
“(our emphasis)”

5.8 Turning to what Aylesbury consider to be sustainable development, Policy S1 entitled ‘Sustainable development for Aylesbury Vale’ sets out development will only be permitted if it complies with the NPPF’s principles of sustainable development. Development should contribute positively to mix of uses, community needs, **reuse of vacant land or underused brownfield land**. Development should integrate communities, minimise impacts on heritage, provide sustainable modes of transport and enhance access to education, employment and community facilities.

- 5.9 Policy **S7 (Previously Developed Land)** supports the principle of reusing brownfield sites – the policy states that reuse of brownfield sites in sustainable locations will make more efficient and effective use of land in Aylesbury Vale.
- 5.10 Policy **S2 (Spatial Strategy for Growth)** states that to meet Government objectives and existing and future housing needs of people in Aylesbury, the council must secure a minimum delivery of 28,600 new homes and 27ha of employment land.
- 5.11 Policy **S5 (Infrastructure)** states that new developments must provide appropriate transport, utility, community and green infrastructure (on and off site) which further support sustainability objectives outlined in the Local Plan.
- 5.12 Policy **E2 (Other Employment Sites)** states that reuse and/or redevelopment of employment sites to a non-employment use will normally be permitted, subject to meeting a number of criteria.
- 5.13 Policy **T1 (Delivering the sustainable transport vision)** states that more sustainable forms of transport will be encouraged to ensure new residential and employment developments do not impact the existing public transportation and highway network.

Dacorum Core Strategy (2006-2031)

- 5.14 The Dacorum Core Strategy was adopted 25th September 2013.
- 5.15 The document's purpose is to anticipate and manage change in Dacorum until 2031. Paragraph 1.1 states that the document sets out a framework which balances the need for new development and infrastructure against the need to maintain the environmental assets and character of the borough.
- 5.16 A summary of relevant policies is provided at **Appendix 9** however, the most important Policies are summarised below:
- 5.17 Policy **NP1 (Supporting Development)** states the council will take a positive approach to developments which reflect the presumption in favour contained in the NPPF.
- 5.18 Policy **CS1 (Distribution of Development)** states that development that supports the vitality and viability of local communities, causes no damage to the existing character of the surrounding area and is compatible with policies protecting or enhancing rural areas will be supported.
- 5.19 Policy **CS2 (Selection of Development Sites)** identifies the development hierarchy, prioritising sites within defined settlements in accordance with the following sequence: (1) previously developed land and buildings; (2) areas of high accessibility and other land; and then extensions to defined settlements.
- 5.20 Policy **CS8 (Sustainable Transport)** states that new development will contribute to a well-connected and accessible transport system. Development will contribute to the implementation of strategies set out in the Local Transport Plan and Local Urban Plan.

- 5.21 Policy **CS17 (New Housing)** states that between 2006 and 2031 an average of 430 additional dwellings will be provided annually.
- 5.22 While a new local plan is being prepared and Regulation 18 consultation on the emerging strategy for growth took place in Nov 2020, progress of this plan is tied in with the evolution of its parent document, the SW Herts Joint Spatial Strategy. As such the new Local Plan is not intended to be adopted until at least October 2025. This means the five year review mandated by paragraph 33 of the NPPF and Regulation 10A of the TCPA Regulations 2012 has not taken place and the extant local plan is almost 10 years old. As such, the housing policies contained within it are out of date and should no longer be afforded full weight.

Dacorum Site Allocations Development Plan (July 2017)

- 5.23 The Dacorum Site Allocations Development Plan Document was adopted in July 2017 and is the second document that will make up the Boroughs Local Plan.
- 5.24 The document sets out how the policies and proposals in Dacorum's Core Strategy (adopted September 2013) will be delivered.
- 5.25 The most important policies have been outlined below:
- 5.26 Policy **SA3 (Improving Transport Infrastructure)** states that opportunities will be taken to enhance footpath and cycle networks and links and support bus patronage.
- 5.27 Policy **T/22** proposes the provision of an improved cycle connection on and off road between Tring Station and Pitstone. This is anticipated to be delivered in the long-term (between 2021 and 2031).

Planning Policy – Other Material Considerations

- 6.1 The policies of the NPPF provide a very important context to the consideration of the ‘planning balance’ to be applied in the case of applications such as this. We therefore set out in this section our consideration of the relevant policies.

National Planning Policy Framework 2021

- 6.2 The Government has made clear its expectation, through the Framework, that the planning system should positively embrace sustainable development to deliver the economic growth necessary and the housing needed to create inclusive and mixed communities. Local planning authorities are encouraged in the Framework to approach decisions on proposed development in a positive and creative way, and should seek to approve applications for sustainable development where possible (Paragraph 38).
- 6.3 **Paragraph 11** states that plans and decisions should apply a presumption in favour of sustainable development. The second limb states that for decision-taking this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:
 - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or
 - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.4 The NPPF, at paragraph 11(d) requires the decision-maker to consider whether the “most important policies” in the development plan are “out-of-date”, thereby triggering the tilted balance if there are no policies in the NPPF which provide a clear reason for refusal.”
- 6.5 **Paragraph 119** states planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that **makes as much use as possible of previously-developed or ‘brownfield’ land.**
- 6.6 **Paragraph 60** states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount of land can come forward where it is needed, that the needs of groups with specific housing

requirements are addressed and that's land with permission is developed without necessary delay.

- 6.7 **Paragraph 73** states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to villages or town, provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).
- 6.8 **Paragraph 79** of the NPPF seeks to promote sustainable development in rural areas and identifies that *"where there are groups of smaller settlements, development in one village may support services in a village nearby"*. This is pertinent as the proposals will form a new village within the context of existing villages and whose residents will benefit from the facilities proposed by the development. **Paragraph 81** identifies that planning decisions should help create the conditions in which businesses can invest and significant weight should be placed on the need to support economic growth, taking into account local business needs.
- 6.9 To support a prosperous rural economy **Paragraph 84** identifies that decisions should enable (inter alia) the sustainable growth and expansion of all types of business in rural areas through well-designed new buildings; and develop accessible local services and communities such as local shops, meeting places, sports venues, open space etc.
- 6.10 To promote healthy and safe communities **Paragraph 92** states that planning decisions should (inter alia): (1) include opportunities for meetings between people through mixed-use development and strong neighbourhood centres and street layouts that allow for easy walking and cycling within and between neighbourhoods; (2) create safe and accessible spaces where crime and disorder, or the fear of crime, do not undermine quality of life of community cohesion; and (3) support healthy lifestyles through provision of green infrastructure, sports facilities, access to healthier food, local shops etc.
- 6.11 To provide for the social, recreational and cultural needs, **Paragraph 93** identifies that planning decisions should (inter alia) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 6.12 **Paragraph 96** requires local planning authorities to ensure faster delivery of public service infrastructure through proactive engagement with relevant bodies to ensure plans for required facilities are in place before applications are submitted.
- 6.13 **Paragraph 98** identifies that access to open space and opportunities for sport/physical activity is important to the health and wellbeing of communities and can deliver wider benefits for nature and support efforts to address climate change. Information gathered from open space need assessments should be used to determine what open space and facilities provision is needed.
- 6.14 In terms of decision taking, **Paragraph 110** requires decision makers to ensure (inter alia) that: (1) opportunities to promote sustainable transport modes have been (or can be) taken up, given the type of development and its location; (2) access is safe for all users; (3) street, parking and transport elements are designed in accordance with national

design guidance; and (4) impacts on the transport network can be cost effectively mitigated.

- 6.15 **Paragraph 111** states that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety or residual cumulative impacts on the road network would be severe. In this context, paragraph 112 identifies that applicants should (inter alia): give priority to pedestrian and cycle movements; address the needs of people with reduced mobility; create safe, secure and attractive places; allow the sufficient delivery of goods and access for emergency services; and provide for electric vehicle charging.
- 6.16 **Paragraph 120 (a)** identifies that planning decisions should encourage multiple benefits from both urban and rural land, including mixed use schemes and taking opportunities to achieve net environmental gains.
- 6.17 **Paragraph 123** identifies that local planning authorities should take a positive approach to application for alternative uses of land which is currently developed but not allocated, where this would help to meet identified development needs. This includes support of proposals which use of employment land for homes in areas of high demand and which make effective use of sites that provide community services.
- 6.18 **Paragraph 126** identifies that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.19 **Paragraph 131** refers to trees and the important contribution they make to the quality of the urban environment and their role in mitigating and adopting to climate change. As such, planning decisions should ensure new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere (e.g. community orchards).
- 6.20 **Paragraph 174** sets out how planning decisions should contribute to and enhance the natural environment. This includes by (inter alia): protecting and enhancing valued landscapes and biodiversity in a manner that is commensurate with their statutory status or identified quality in the development plan; providing net biodiversity gains; preventing new or existing development from contributing to unacceptable risk and levels of soil/air/water or noise pollution; and remediating derelict and contaminated land.

National Planning Practice Guidance

- 6.21 The National Planning Practice Guidance (NPPG) was published in March 2014 and is regularly updated to align with revisions of the NPPF. The NPPG supports the NPPF and provides guidance on topics such as (inter alia) decision making, delivering sufficient supply of homes, making effective use of land, promoting healthy and safe communities, meeting the challenges of climate change and achieving sustainable development. The development has been designed to comply with those parts of the NPPG that are material.

Government Impetus to Delivery Major Development on Previously Developed (Brownfield) Land

- 6.22 **30th November 2021** – Press Release: ‘New homes to be built as part of government drive to develop brownfield land and regenerate communities’

The Department of Levelling Up, Housing and Communities announced that under the flagship government, a further £11 million has been allocated from the Brownfield Land Release Fund to Council’s to support 23 redevelopment schemes across 15 councils.

Housing Minister Christopher Pincher stated that:

“Our brownfield-first approach is transforming underused sites into thriving communities where people want to live, work and visit.”(our emphasis)

The government’s approach to redeveloping brownfield land is also being supported by more than £1.8 billion. This was announced at the Budget to renew and restore sites to unlock a further 160,000 homes.

This builds on the £475 million the government has provided in the past 18 months to deliver over 31,000 homes on brownfield land.

- 6.23 **12th October 2021** – Press release: ‘Thousands of new homes to be built and derelict land transformed’

Almost £58 million from the £75million Brownfield Release Fund has been allocated to 53 councils.

This funding will boost local areas by transforming unloved and disused sites into vibrant communities for people to live and work.

Development of brownfield sites will help to protect the countryside and green spaces while an extra 5,600 homes are built on these sites.

- 6.24 **6 October 2021** – Conference ‘Boris Johnson addressed Conservative Party Conference 2021’

As the Prime Minister Boris Johnson addressed the Conservative Party Conference he stated that:

“You can also see how much room there is to build the homes that young families need in this country not on green fields not just jammed in the south east but beautiful homes on brownfield sites in places where homes make sense”

- 6.25 **16 December 2020**- Press release: ‘Housing and Economic Needs Assessment’

PPG Paragraph 035 states that in considering how need is met in the first instance, brownfield and other under-utilised urban sites should be optimised to promote the most efficient use of land. This is to ensure that homes are built in the right places, to

make the most of existing infrastructure and to allow people to live nearby the services they rely on, making travel patterns more sustainable.

Paragraph 010 states that in situations where previous levels of housing delivery in an area or previous assessments of need are significantly greater than the outcome from the standard method, authorities are encouraged to make as much use as possible of previously developed or brownfield land.

6.26 **12 March 2020** – Policy Paper: ‘*Planning for the Future*’

Paragraph 8 states that the government is now setting out reforms to encourage local authorities to take a more proactive approach to enabling home building. This includes supporting them to make the most of their under-utilised brownfield land.

Paragraph 9 – planning changes will be underpinned by an additional £10.99bn of funding. This will support communities to regenerate brownfield land, invest in new infrastructure and provide more homes for local people, with better access to jobs, schools and opportunities.

Paragraph 10 states that as part of promoting more, well-planned development where homes are needed the government will back brownfield to encourage greater building in urban areas.

6.27 **27th October 2021**- Budget and Spending Review: Sunak outlines £24bn housing settlement

Speaking in the House of Commons chancellor Rishi Sunak set out a £24billion housing settlements, allocating £11.5bn of this to up to 180,000 new affordable homes.

6.28 Sunak expressed that brownfield land will be the target for delivering these homes and stated that:

“We’re investing an extra £1.8 billion: enough to bring 1,500 hectares of brownfield land into use to meet our commitment to invest £10bn in new housing and unlock one million new homes.”

6.29 In the context of the preference to development on brownfield, **paragraph 141** of the NPPF requires a robust land assessment to be carried out during the policy making process before any changes to the Green Belt boundary can be justified. At examination, the suggestion of any amendment of the GB boundary within a development strategy will need to be considered in the context of determining if the strategy makes as much use as possible of suitable brownfield sites and underutilised land.

The Levelling Up & Regeneration Bill (LURB)

6.30 In December 2022, the Department for Levelling Up, Housing and Communities (DLUHC) held a consultation on the reforms to the national planning policy. Whilst the proposed planning reforms contained within the LURB are subject to ongoing parliamentary scrutiny, the Bill sets out Central Government’s proposed set of measures that will shape our approach to development growth once enacted.

- 6.31 The proposed measures further elevate Central Government’s brownfield first approach. For example, lower Infrastructure Levy rates applied to brownfield over greenfield are being considered to increase the potential for brownfield redevelopment. The intention is clear that greater restriction will be applied to the development of greenfield and Green Belt land through the proposed National Development Management Policies. The proposed amendments to the NPPF make it clear that local planning authorities will not be required to review or alter its Green Belt boundaries to meet housing need, in turn placing greater pressure on the development of brownfield sites.
- 6.32 In December 2022, the Secretary of State for Levelling Up, Housing and Communities, Michael Gove made a statement which reiterated the Government’s brownfield first pledge, stating that national policy gives “**substantial weight to the value of using brownfield land**”. Within this statement Gove also refers to measures that will make it harder for developers to build on important agricultural land for food production.

Emerging Development Plan

- 6.33 As a recently formed authority, Buckinghamshire Council must produce a Local Plan within 5 years of its establishment (i.e. adoption by April 2025). The Local Development Scheme indicates that plan preparation is taking place from 2022 with the later stages of the Plan process (i.e. publication, submission and Examination in Public) could take place during 2024 and perhaps into early 2025.
- 6.34 The New Dacorum Local Plan (2020-2038) is emerging in conjunction with its parent document, the South West Herts Joint Spatial Plan. The Local Development Scheme (Feb 2022) indicates that the new local plan is in its early states of preparation, with public consultation on the draft version of the Local Plan (Regulation 18) in Jun 2023 followed by formal Regulation 19 publication in Jun 2024 and, following independent examination, adoption is anticipated in October 2025.
- 6.35 At this stage, neither emerging plan should be afforded any weight in the determination of this planning application.

Guidance Notes

- 6.36 Supplementary Planning Documents and Advice Notes adopted by the Vale of Aylesbury and Dacorum Council are of relevance as listed at **Appendix 9**.

Planning Assessment

- 7.1 As required by Section 38(6) of the Planning and Compulsory Purchase Act 2004, the starting point for the assessment has to be the relevant policies as set out in the Development Plan.
- 7.2 This section of the Planning Statement provides an overview of the key planning considerations of the proposed development of Upper Wellington and summarises how key planning policies and material considerations have informed the scheme, ensuring the development is in compliance with the Statutory Development Plan (when taken as a whole) and so should be granted planning permission without delay.
- 7.3 Notwithstanding the Applicant's position, if some conflict with the Development Plan is identified, we consider that decision taking should be undertaken in accordance with Paragraph 11(d) of the NPPF under the presumption in favour of sustainable development on the basis that both Councils cannot, in our view, demonstrate a 5 year housing land supply.

Principle of Development

- 7.4 Whilst the site is not allocated within the adopted Buckinghamshire (Aylesbury Vale area) or Dacorum Local Plans, the growth strategy set by Policy S2 of the VALP identifies the '*minimum*' housing delivery requirements and other Plan objectives and policies, including Policy S1 and S7 are encouraging of additional growth, especially on brownfield land. The site offers the opportunity to provide c.320 new homes and a mix of community and employment uses as a sustainable development on a previously developed brownfield site.
- 7.5 Starting with the 'Objectives' of the Plan, the first Objective in Aylesbury is as follows:

*"Provision will be made for balanced sustainable growth which will deliver new housing and jobs to meet the needs of new and existing residents through a flexible and pro-active approach to promoting sustainable development which includes a combination of new allocations, protection of existing sites, **redevelopment of previously developed land** and a more intensive use or conversion of existing sites.*
"(our emphasis)
- 7.6 Policy S1 of the VALP states that priority will be given to reuse of vacant or underused brownfield land and Policy S7 of the VALP states that development is expected to make more efficient and effective use of land in Aylesbury Vale and encourages the reuse of brownfield sites in sustainable locations. By virtue of proposed mix of development uses (which encourage internalisation of trips), the committed and secured accessibility enhancements and Framework Travel Plan (which provide a choice of sustainable modes of transport for journeys offsite) and detail contained within the Transport Assessment (which identifies existing facilities within cycle and walking distance), the applicant has demonstrated that development will be sustainably located. Indeed, the supporting documents with this application demonstrate how the development will achieve many strands of sustainability, not just for new residents of

the community, but also for residents in villages and other homes in the surrounding area.

- 7.7 The encouragement in the VALP for development on brownfield land is also supported by the National Planning Policy Framework (NPPF). Paragraph 119 of the NPPF confirms that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. There is a requirement for strategic policies to set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. The effective use of previously developed land is clearly a policy imperative of Government (alongside significant boosting the delivery of homes), and this is also apparent from the various ministerial speeches and Government Papers highlighted earlier in this Statement.
- 7.8 In respect of the sustainability of the site, the NPPF sets out that sustainable development has three overarching objectives which are interdependent and comprise:
- An economic objective – to help build a strong, responsive and competitive economy
 - A social objective – to support strong, vibrant, and healthy communities
 - An environmental objective – to contribute to protecting and enhancing our natural, built, and historic environment
- 7.9 The proposals offer a wide range of benefits. The new homes would contribute to housing need, while the community and employment uses would support the local community and economy. Sustainability is at the heart of the proposals and has influenced the design, layout, and technical details. The landscape, ecology, heritage and drainage proposals will enhance the natural and historic environment, and the scheme will encourage social cohesion, health and wellbeing through provision of a range of public and community open spaces.
- 7.10 The proposals are therefore demonstrated to be compliant with local policies which seek to make efficient and effective use of previously developed land, support the three overarching objectives in the NPPF and comprise sustainable development.

Housing Mix and Affordable Housing

- 7.11 In accordance with VALP Policy H6a and Dacorum CS19 and in the interest of creating a socially mixed and inclusive community, a range of housing types and sizes will be provided. While the precise mix and house types is subject to detailed design, the Illustrative Heights and Land Use Plan (contained within the Design and Access Statement) indicates a range of building height across the site (up to three storeys), providing flexibility for a range of house sizes and types to be delivered. A range of house types and tenures will also be secured through the s106 for the permission.
- 7.12 With regard to affordable housing provision, it is noted that Dacorum Council's policy CS19 requires 35% affordable (75% of which is to be social rent) and Policy H1 of the

VALP requires a minimum of 25% affordable onsite (with tenure split to reflect the Council's most up-to-date evidence on housing need). Policy H6c of the VALP requires 15% of the affordable homes to be wheelchair accessible (meeting M3(3) of the building regulations).

- 7.13 Affordable housing will be pepper potted throughout the development, with a higher proportion provided within the westernmost section of the site which spatially reflects the higher percentage of affordable housing sought by the Dacorum Council Local Plan.
- 7.14 In accordance with the updated National Planning Policy Guidance, at least 25% of the affordable provision will comprise First Homes (i.e. discounted open market tenure). This will amend the Councils' current policy position on tenure split nonetheless appropriate onsite provision will be secured by legal agreement (s106), with the tenure to be secured in accordance with the stipulations of the local policies and national guidance.
- 7.15 In accordance with Policy H5, a percentage of serviced plots will be provided for sale to self/custom builders. The percentage of self build and the most appropriate location for these plots will be subject to discussion with Buckinghamshire Council during the determination period.
- 7.16 In summary, the proposals are confirmed to be in compliance with the Statutory Development Plan, specifically VALP Policies H5,H6,H1 and Dacorum policy CS19.

Design, Layout and Public Open Space

- 7.17 A Design and Access Statement (DAS) and illustrative masterplan are submitted to provide more information of the design evolution and approach to the proposals.
- 7.18 The DAS demonstrates how the existing site constraints, opportunities and surrounding context have been reviewed and incorporated into the design proposals and how key design principles have been integrated into the proposals to create a sense of place. In doing so, due regard has been given to local design policies and guidance (including VALP policies BE2 and BE4; Dacorum policies CS10, CS29 and strategic design guide 2021) and the National Design Guide.
- 7.19 The DAS also demonstrates how sustainability has influenced the proposals, in particular the approach of creating connections to existing neighbouring communities. The proposed mix of uses, mix of house types and sizes, and the range and amount of open space support the creation of a sustainable community which is accessible to existing communities.
- 7.20 The scheme provides the opportunity to enhance the existing brownfield site by providing a range of public open spaces, including multi-functional natural amenity green spaces, a community garden, and an orchard. The proposals will also provide at least 800 sq m of children's play, a Multi-Use Games Area (MUGA) and 2.5km trim trail with further opportunities for outdoor gym equipment and natural play.

- 7.21 There is also an opportunity for the primary school's playing field and MUGA to be used by the community outside of school areas. This will be reviewed further with the Council's Education team, and may be secured by an agreement.
- 7.22 In summary, whilst the design of the proposals is subject to reserved matters, the parameters and principles identified by the proposed development are confirmed to be in compliance with the Statutory Development Plan, specifically VALP Policies BE2 and BE4, and Dacorum policies CS10 and CS29.

Landscape and Visual

- 7.23 A Landscape and Visual Appraisal (LVA) is submitted and provides an assessment of the existing character of the site and its landscape context (summarised at paragraphs 2.17-2.23 above); and proposes a landscape strategy for the site itself including the proposed offsite highway works to mitigate views and assimilate the proposed development into its settlement and rural landscape context.
- 7.24 The scope of the LVA has been informed through consultation with the local authority landscape officers. As such, the LVA includes a cumulative assessment with other developments in the locality as well as an after dark assessment. Consideration has also been given to the visual effects associated with the proposed offsite highway works.
- 7.25 During consultation on the original application comments, the Landscape and Urban Design Officer concurred with the moderate adverse effects in Year 1 of the development but disagreed with the moderate/neutral landscape character effects that were assessed at Year 15 (at a point in time when the developments landscaping will be established). In this context, greater detail has been applied to the photomontage views, which takes into consideration the likely materiality of the development to better assimilate the proposals visual impacts. The LVAs overall assessment of the proposals remains unchanged.
- 7.26 Due to the low-lying nature of the landscape, the site is noted to be screened by existing vegetation meaning perception of the proposed development would be generally limited to within 1km of the site boundary to the north, with some visibility beyond this from higher ground at Westend and Southend Hills. Visibility extends approximately 500m south of the site boundary across a field adjacent to Long Marston Road.
- 7.27 In accordance with BE3, residential amenity is not unreasonably affected by the development. Residential receptors are limited to properties within 1km of the site, with those directly abutting the site experiencing the greatest effect. However, direct views into the site from such properties is likely to be limited to the upper floor rooms and long-term effects will be reduced at a time when the proposed boundary hedgerow and trees will have matured.
- 7.28 The development has been informed by the LVA and the mitigating landscape strategy includes the retention and enhancement of good quality landscape fabric such as trees and hedgerows, the creation of green corridors, and creation of woodland buffers.

- 7.29 Furthermore, the key development parameters have been informed by the local distinctiveness and vernacular character of villages in the locality. This is detailed further within the Design and Access Statement, with the illustrative masterplan demonstrating how the proposals could be sensitively delivered within its context in accordance with AVLP policy BE2.
- 7.30 The LVA concludes that some long-term cumulative visual effects would be experienced, however, this is limited to receptors using promoted routes along ridgelines of the Chilterns AONB and users of PRoW that connects Old Airfield Industrial Estate to the B488. The long term effect to PRoW users has been assessed to be no higher than 'moderate/minor adverse, with this effect decreasing with distance.
- 7.31 In accordance with Policy NE4, the development appropriately mitigates adverse impacts to the character of the receiving landscape(s). Through delivery of the identified landscape strategy, long term effects to the host LCAs is assessed to be no higher than 'moderate adverse' and long term effects upon the non-host LCAs (specifically Westend and Southend Hills) is no greater than 'moderate/minor adverse'. Moreover, the assessment notes that the development would enhance the baseline character of the site through the removal of existing structures which are in various stages of repair and proposed planting and hedgerow enhancements.
- 7.32 Impacts upon the Chilterns AONB have been robustly assessed and in accordance with AVLP Policy NE3 (which seeks to conserve and enhance the special qualities of the ANOB) and the development aligns with the management plan policies which are relevant to development within the setting of the AONB.
- 7.33 In accordance with local policies (BE2, BE3, NE3 and NE4) and Paragraph 130 of the NPPF, the development is demonstrated to be sympathetic to local character, including the surrounding built environment and landscape setting.

Trees

The Site

- 7.34 The submitted Preliminary Arboricultural Impact Assessment (AiA) assesses the impact of the proposed development towards existing trees. It confirms that tree removals are predominantly limited to lower quality (Category C) trees within the site's interior. Removal of these trees is confirmed to be in accordance with Dacorum's policy CS12.d and AVLP NE9 which require adequate replacement where a loss of trees is justified.
- 7.35 The proposals intend to conserve existing boundary vegetation and enhance its landscape, ecology and amenity function through tree and hedgerow planting as illustrated by the Landscape Strategy, prepared by EDP. This includes the removal of the existing Leylandii along the sites southern boundary which is a non-native species and will be replaced with native species.

Offsite Highway Works

- 7.36 A supplementary AiA has also been prepared to consider the impact of the proposed offsite highways works (discussed at Section 4.7) that will be delivered via S278 of the Highways Act. The proposed works have been updated since the original application and a collaborative approach has been applied to the proposed works, involving an

arboricultural review and tailoring of the design to minimise impacts upon trees and hedgerow along the highway verge.

- 7.37 The report identifies the need to remove 41 trees, the removal of 4no. Category C hedgerows (totalling c.90m) and partial removal of Category C hedgerow (totalling c.62m). An arboricultural report considers 10 other trees will need to be subject to a watching brief to establish their rooting environment and whether or not they can be retained. To mitigate the necessary and potential loss, the AIA recommends the replacement of 61no. trees and 152m of hedgerow with the preference for these to be of a native species and to be planted along the highway verge to assimilate the highway works into the local street scene.
- 7.38 The recommendations of the Highway AiA have informed the highway landscape strategy which identifies areas along the roadside where new tree and hedgerow planting could be located. The indicative locations for the tree planting have been reviewed by highways consultant, Eddisons to ensure planting is appropriate from a highways safety perspective. This, in conjunction with the significant opportunities for tree and hedgerow planting within the site itself, confirms that the removal of trees to facilitate improvements to the footpath and carriageway to be in accordance with Dacorum's policy CS12.d and AVL P NE9.

Chiltern Beechwoods Special Conservation Area

- 7.39 The Ecological Impact Assessment identifies one European designated site (Chilterns Beechwoods Special Area Conservation (SAC)) within 10km radius of the site and one nationally designated site (Tring Reservoirs SSSI) within a 2 km radius of the site. The applicant has engaged with Natural England (NE) via its discretionary advice service in relation to the Habitat Regulations. It was advised that an Appropriate Assessment will be necessary to assess the nitrogen disposition and recreational impacts upon the SAC.
- 7.40 A nitrogen disposition assessment was undertaken and the results were discussed with Natural England in August 2022. It was confirmed that vehicle movements are expected to be under 50 Annual Average Daily Traffic (AADT) therefore, Natural England concurred that effects on the Chiltern Beechwoods SAC can be considered nugatory and scoped out of any further assessment.
- 7.41 With regard to recreational pressures, a report was published in March 2022 by Dacorum Borough Council which identifies the need to mitigate recreational impacts on Ashbridge Commons. A 12.6km Zone of Influence (Zoi) was drawn around Ashbridge Commons which included land within the boundaries of Dacorum Borough Council, Buckinghamshire Council, Central Bedfordshire Council and St. Albans City and District Council.
- 7.42 The four authorities are collaborating on a strategy to resolve recreational pressure on Ashbridge Commons through the identification of strategic Suitable Alternative Natural Greenspace (SANG). In the meantime, residential development within the Zoi will be required to demonstrate that a significant adverse effect on the SAC can be mitigated or avoided and will be subject to a Habitats Regulation Assessment (HRA).
- 7.43 The evolving Mitigation Strategy published by the Councils provides guidance for developers who intend to bring forward bespoke SANG and identifies critical

components that must be incorporated into its provision. For example, a minimum 2.3km walking route with parking must be included and a management strategy must be in place to ensure it is maintained in perpetuity (80 years). In terms of scale, SANG must be provided at a rate of 8ha per 1,000 new residents (0.0192ha per dwelling). In the context of Upper Wellington, the scale of SANG to mitigate the development would need to be a minimum of 6.14ha. Furthermore, catchment areas for SANG are identified depending on the size of SANG to be provided. For example, SANG >20ha in size will attract a catchment area of 5km.

7.44 A shadow Habitat Regulations Assessment (sHRA) has been carried out by Tyler Grange and is submitted in support of the re-submission application. The Assessment identifies the potential for increases in recreational pressures deriving from the proposals and identifies the need for 6.14ha of Suitable Alternative Natural Greenspace (SANG). In the absence of any strategic mitigation being in place, the Applicant has been liaising with third parties to secure bespoke SANG provision. While the location of this SANG provision remains commercially sensitive, discussions with third parties have been informed by the Councils Mitigation Strategy which sets out the criteria and necessary components of SANG for it to be considered a suitable form of mitigation. Within the sHRA, the Applicant commits to:

- SANG provision that is an appropriate quantum, specification and distance from the Application site to meet the criteria contained within the Council(s) Mitigation Strategy.
- The SANG will be maintained in perpetuity (usually defined for a minimum of 80 years) and the design will be agreed in consultation with Natural England. This will be secured in the form of a Management Plan.
- Proportionate contributions will be made towards the Strategic Access Management and Monitoring of the SAC itself. Contributions will be in accordance with the Apportionment stipulated within the Councils Mitigation Strategy (i.e. £913.88 per dwelling within Dacorum and £87.03 per dwelling in Buckinghamshire Council (East).

7.45 Opportunities for recreation have been maximised within the development itself, with the intention to minimise impacts to offsite receptors, through the provision 4.33ha of public open space and a 2.5km walking route. The above measures will be secured via the S.106 Agreement to ensure compliance with VALP policies DM31 and DM32, with the detail and form of mitigation to be agreed through ongoing consultation with NE and the Councils' ecologists. The sHRA concludes that no adverse effect on the integrity of the Chiltern Beechwoods SAC will occur from the proposed development and that consequently, the proposals are in conformity with the relevant national and local planning policies.

Ecology

7.46 Early engagement was carried out with the ecologists at Dacorum and Buckinghamshire Councils to confirm the approach to the surveys which are to be carried out of the site across the survey seasons of 2021 and 2022. All surveys remain in date and valid for the purposes of the re-submission.

- 7.47 An Ecological Impact Assessment is submitted which sets out the findings of an 'extended' Phase I habitat survey and Phase 2 surveys (including bat emergence/re-entry, bat activity, great crested newt Habitat Suitability Index Assessment (HIS) of ponds and breeding bird surveys on the site).
- 7.48 The Ecological Impact Assessment identifies that the site comprises (inter alia) neutral grassland, mixed scrub, tree lines, standing water (noted to be unsuitable for GCN) and developed land comprising buildings and hardstanding. Some features have been identified as habitats of local ecological importance which support foraging and commuting bats and breeding birds.
- 7.49 Where these features are to be lost as part of the development, this will be compensated for through habitat creation and enhancement measures on-site, in line with Dacorum Local Plan policy CS26 and CS29 and Aylesbury Local Plan policy NE2, which will include the following:
- Enhancement of grassland areas to neutral grassland and scrub habitat around the site boundary;
 - Creation of new ecologically designed Sustainable Urban Drainage System (SUDs). This includes the creation of new habitat by virtue of opening up an existing culvert into an open swale;
 - Planting of a new native species orchard, made up of native fruit and nut trees;
 - Native street tree planting;
 - Creation of native, species-rich hedgerow with trees around the site boundary and enhancement of the current hedgerow and tree line; and
 - Wildflower meadow grassland mix planted across the site.
- 7.50 In terms of mitigation (via a Construction Environmental Management Plan) and habitat design which can be incorporated into the production and implementation of a Landscape and Ecological Management Plan (LEMP), which can be secured by planning condition.
- 7.51 The results of the DEFRA 4.0 Metric confirm that the proposed development will deliver a 10.02% net gain in habitat units and 292.17% net gain in hedgerow units. The proposals are therefore in accordance with paragraph 120 of the NPPF.
- 7.52 As demonstrated by the Illustrative Masterplan, the scheme will enhance the existing brownfield site by creating a range of public open spaces, natural green spaces, landscaping, tree planting, and a Sustainable Urban Drainage System (SuDs). These features will provide both ecological and amenity enhancements to the site in accordance with Dacorum policy CS26 and VALP policies DM29 and DM30.

Built Heritage

- 7.53 A Built Heritage Assessment (BHA) is submitted. The BHA provides an initial record and assessment of the existing buildings on the site. The BHA confirms that there are no designated heritage assets on the site, and it does not lie within a Conservation Area.
- 7.54 Marsworth Conservation Area is situated approximately 450m to the east, however there is no inter-visibility between the site and Conservation Area and the site is not considered to contribute to the significance of the Conservation Area setting.
- 7.55 As such, the key policy applicable to the site is paragraph 203 of the NPPF which requires a *“balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 7.56 Marsworth Airfield’s structures and features to the north and north-west of the application site have been substantially removed and returned to agricultural or private land, including the runways, control tower and all hangar buildings. As such the heritage impact of the airfield has been considerably diminished.
- 7.57 The existing buildings and structures on the site are assessed as comprising mainly ancillary structures that would have supported the principal operational activities of the airfield, and many are in various states of repair. Only two buildings, comprising a pair of altered Romney Huts, are identified as having any potential to be considered as Non-Designated Heritage Assets (NDHA).
- 7.58 However, the Statement of Significance within the BHA assesses that the two Romney Huts represent a very common building type that was constructed extensively across Second World War military sites. Their simplistic construction and widespread use considerably limits their significance, in addition to the evident alteration carried out to each building, including the replacement of the barrel roofs in the late 20th/early 21st century.
- 7.59 The development proposes the demolition of all buildings on the site with the exception of two blast shelters, which could be retained as part of a historic trail/footpath network. The demolition of the majority of existing buildings will enable a coordinated approach to layout to be undertaken throughout the site.
- 7.60 The suggested provision of a heritage trail would provide future occupiers and the surrounding local community an opportunity to understand the history of the site. The opportunity for the rural enterprise hub to take design cues from the Romney Huts is also explored within the supporting Design and Access Statement and can be secured via detailed design.
- 7.61 In accordance with VALP policies S1 and BE1 and Dacorum policy CS27 the proposals demonstrate that it conserves heritage assets in a manner appropriate to their significance and seek enhancement wherever possible.

Archaeology

- 7.62 An Archaeological Desk-Based Assessment (ADBA) is submitted. The ABDA has identified no overriding archaeological constraints to the proposed development. The assessment has identified that the site has a low archaeological potential for all periods, and that during the prehistoric, Roman and medieval periods the site lay on the hinterland between known settlements. There is the potential for archaeological remains to occur within the site associated with the 20th century military use, but such remains are unlikely to be of more than local interest.
- 7.63 There is a Scheduled Monument around 950m to the north-east of the site, comprising a small hillfort on Southend Hill. The ABDA has assessed the potential impact of the proposals on the hillfort, and concludes that overall the redevelopment of the site would not result in harm to the significance of the Scheduled Monument.

Transport, Parking and Access

- 7.64 A Transport Assessment (inc. Framework Travel Plan) has been produced and updated for the purposes of this re-submission by Eddisons. The scope of the assessment has been informed by discussions with Buckinghamshire County Council (BCC), including comments raised during consultation of the original application. Furthermore, the proposed transport measures have been guided by conversations with relevant operators.
- 7.65 It is proposed that the primary vehicular access is taken from Long Marston Road via a priority junction with ghost island right turn arrangement – these arrangements have been informed by a Stage 1 Road Safety Audit and analysis from a 7-day traffic count (which took place in October 2022) to confirm suitability of the proposed visibility splays. This new access is proposed alongside carriageway and footway improvements along Lukes Lane and Long Marston Road (summarised in Section 4).
- 7.66 The TA considers impacts of the proposed development upon the existing road network including:
- Tring Road/Lukes Lane/Wingrave Road priority junction;
 - B489 Lower Icknield Way/Vicarage Road priority controlled junction;
 - B489 Lower Icknield Way/Tringford Road/Wingrave Road roundabout junction.
- 7.67 The junction capacity testing has been updated taking on board comments raised by the Highways Authority. It is now informed by an additional traffic count and the baseline includes the proposed development on 'Land East of Tring' for up to 1,400 homes (notwithstanding this development not yet being confirmed as 'committed' as it is subject to an ongoing appeal Ref: 3309923). Based on a 2030 flow scenario, the updated TA confirms that all junctions will operate within capacity during peak periods in 2030.
- 7.68 Road safety analysis has also been carried out, confirming that no highways safety issues are identified.

- 7.69 In accordance with AVLP S1, T1, Dacorum Policy CS8 and the NPPF – the proposals include a commitment to deliver a suite of sustainable transport measures (described at 4.11) to encourage modal shift. These measures have been informed by ongoing discussions with operators (such as the bus and car club operators) who confirm their ongoing support and ability to serve the development.
- 7.70 The TA concludes that the development will provide a sustainable development in transport terms.

Flood Risk and Drainage

- 7.71 A Flood Risk Assessment is submitted in support of the application and includes a drainage strategy to illustrate the surface water and foul drainage arrangements for the site, using Sustainable Urban Drainage systems comprising a network of swales and attenuation features. The FRA has been updated to include consideration of comments raised by the Local Lead Flood Authority during consultation on the original application. Updates have been informed by an additional site survey to ascertain the position of existing water infrastructure. The site survey confirmed that the only flow route that is present across the site is along a culverted water course but that there is opportunity for the section that traverses the site to become an open watercourse feature. As such, the re-submission incorporates the opening of this channel into the scheme.
- 7.72 The report identifies that the site is located in Flood Zone 1 with a low probability of flooding from fluvial and/or tidal sources. The risk of other sources of flooding, such as watercourse, groundwater, sewer, reservoirs, and surface water is identified as low. Accordingly, the proposed development land is in a preferable location for development when appraised in accordance with the NPPF Sequential Test and local policy
- 7.73 There is an area to the north-east of the site that is of medium-high surface water flood risk, however all hardstanding is proposed to be removed from this area and kept as green space.
- 7.74 The outline drainage strategy splits the site into a number of drainage catchments and identifies that surface water could be attenuated using five attenuation basins and swales (SUDs) within the site's proposed green infrastructure. In accordance with VALP policy I4, the basins have been designed to accommodate surface water for a 1 in 100 year + 40% climate change allowance before out falling into the sewer network.
- 7.75 The SuDS system will also provide at least 2 stages of treatment which will maintain the quality of water discharged from the development.
- 7.76 The LLFA expressed concerns regarding the location of one of the attenuation basin near this areas of surface water flood risk, indicating that surface water flows that are outside of the Applicant's control could inundate basin E. The FRA confirms that the creation of an open water feature (from the currently culverted watercourse) overcomes this risk by providing a destination for the surface water to flow into. Creating an open watercourse will also allow for a greater volume of surface water to flow through the site compared to the existing pipe, again reducing any surface water ponding in that location. Furthermore, no development is proposed to the east of the

watercourse, meaning the design of the watercourse can ensure that any surface water flow greater than the volume of the channel overflows into the eastern open space instead of Basin E. This can be achieved by lowering the eastern bank of the watercourse.

- 7.77 The assessment confirms that the site is fully able to comply VALP and Dacorum local policy together with national policy and technical guidance.

Noise, Air Quality and Contamination

- 7.78 A Noise Impact Assessment and Air Quality Assessment is submitted with the outline planning application. These assess the impacts of the proposed development and set out approaches to mitigation if required.
- 7.79 The Noise Assessment has been updated to take into account comments raised by the Environmental Health Officer and includes an assessment that takes into consideration aviation noise associated with the airfield to the north of the site. Additional noise surveys were carried out and confirmed that recreational aircraft will have a minimal impact on the noise climate. Having regard to the baseline assessment of the ambient sound climate, the noise assessment concludes that there is a negligible risk of adverse effects from noise and that suitable internal ambient sound conditions compliant with British Standards can be achieved.
- 7.80 The noise assessment considers potential impacts upon sensitive receptors located along Lukes Lane arising from road traffic intensification, including potential impacts on new residents arising from noise generating sources (such as the use of Air Source Heat Pumps, recreational aircraft activities to the north of the site and sports taking place within the proposed Multi Use Games Area).
- 7.81 The assessment confirms that suitable internal ambient sound conditions, that are compliant with standards, can be achieved for the new dwellings with the application of appropriate sound insulation measures.
- 7.82 The assessment confirms that noise levels in the rear gardens of the properties along Lukes Lane will remain within the levels set by the requisite British Standards and WHO guidelines.
- 7.83 The supporting Air Quality Assessment considers the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction and emissions from road traffic generated by the completed and occupied development. It concludes that through the implementation of mitigation measures, such as a Construction Environmental Management Plan to minimise dust emissions, impacts will be negligible during construction. Impacts during operation of the development are identified to be negligible with no mitigation required. Despite the negligible impacts, opportunities to improve air quality have been incorporated including a high provision of electric vehicle charging points in accordance with policies T8 and CS8.

- 7.84 A Phase 1 Geo-environmental Site Assessment is submitted and identified a number of potential contamination sources present onsite due to its former use, with the potential for these to impact receptors through a number of pathways. There is also a 'medium to high' risk from unexploded weaponry. The assessment recommends further intrusive surveys to be carried out (i.e. Phase 2 investigations) to determine the extent of contamination present onsite and inform an appropriate remediation strategy (which can be secured by planning condition). The site's redevelopment will present significant benefits in terms of cleaning up contamination that is present onsite which may be impacting human health.
- 7.85 These assessments confirm that the development is consistent with Paragraph 183, 185 and 186 of the NPPF including policy NE5 of VALP and CS32 of the Dacorum Local Plan.

Utilities

- 7.86 A Utility Feasibility Report is submitted and identifies the impact of the proposed development on existing electricity, gas, water, and telecoms infrastructure.
- 7.87 The Report sets out the approach and costs of providing connections to existing utilities, in coordination with the relevant utility providers, which the Applicant has duly considered as part of its internal costing exercise. The Report identifies that through the upgrade of existing or installation of new infrastructure, the development will be adequately served with the necessary utilities.
- 7.88 Moreover, by virtue of the proposed development there is opportunity to improve existing infrastructure arrangements (such as broadband) for existing residents in the locality.
- 7.89 In this context the proposals are found to be in compliance with infrastructure policies S5 of the VALP and CS23 of the Dacorum Core Strategy.

Five Year Housing Land Supply

- 7.90 Notwithstanding the compliance with the Development Plan's spatial strategy (as set out above), whereby the proposal should be considered to accord with an up-to-date development plan and be approved without delay (as per paragraph 11 (c) of the NPPF, we consider that this proposal should be considered under paragraph 11 (d) of the NPPF's presumption in favour of sustainable development. This is on the basis that Dacorum Council acknowledge it does not have a five year supply and it is our view that Aylesbury Vale cannot currently demonstrate a five year supply of housing.
- 7.91 In our view, the presumption is also triggered in Dacorum due to the age of the development plan and the fact that housing policies are based on an out of date assessment of need and so the most important policies cannot be considered up to date. Consideration in this regard aligns with the finding of an Inspector in a recent appeal (13 Feb 2023, Ref: APP/P0119/W/21/3288019) where the Inspector found that the housing requirement on which the spatial strategy (adopted in 2013) was reliant on a housing market assessment which pre-dated the NPPF. Paragraph 12 of the decision

concluded that the Core Strategy and the settlement boundaries that depend on it, are not compliant with the Framework and are therefore, out of date.

Dacorum Council

- 7.92 Dacorum Borough Council's Local Plan is older than five years meaning the national standard methodology for calculating housing need is applicable. This has meant that the Council's housing requirement has increased from 430 to 1,023 homes per annum. The Council's latest statement considers the base date 2019/20 and was published in December 2021.
- 7.93 When calculating from the 1st April 2020 to 31st March 2025 base date and applying a 5% buffer to the housing requirement, this results in a five year requirement of 5,934 homes. The Council's deliverable supply is 3,823 homes in the five year period, resulting in a five year housing supply position for 2020-2025 of only **3.2 years**.
- 7.94 The Housing Delivery Test Results for Dacorum Borough Council was published in January 2012, identifying that it has underperformed against the test, delivering 89% of its requirements over a three year timeframe (2017/18-2019/20). As a result, it has prepared an Action Plan (published in December 2021) to demonstrate how it is to positively responding to the government's requirement to boost the supply of housing.
- 7.95 To boost delivery, the Action Plan places emphasis on a number of focal areas including (inter alia) identifying new sites by updating its SHLAA/Call for Site/Brownfield Register.

Buckinghamshire (Aylesbury Vale)

- 7.96 We have considered the Council's five year supply position based on the Aylesbury Vale April 2022 position statement (which remains to be the latest publication). When calculating from the 1st April 2021 to 31st March 2026 base date, applying a 5% buffer to the housing requirement and accumulated shortfall results in a five year requirement of 7,621 homes. The Aylesbury Vale Position Statement claims a total deliverable supply of 7,679 dwellings in the five year period. **The five year housing supply position for 2021-2026 is only 5.0 years.** The Council is, therefore, only just meeting the Government's minimum requirement on its own figures.
- 7.97 Whilst the current assessment of supply is for the period 2021 to 2026, the position statement includes a calculation for 2022-2027 and confirms (at paragraph 2.1) that the requirement and projected deliverable supply for 2022-2027 will be applied in decision making from 1 April 2022. We have concerns with this approach, noting that this is not supported by up to date and verified completions data.
- 7.98 When calculating from the 1st April 2022 to 31st March 2027 base date, applying a 5% buffer to the housing requirement and accumulated shortfall results in a five year requirement of 7,768 homes. The Aylesbury Vale Position Statement claims a total deliverable supply of 8,028 dwellings in the five year period. **The five year housing supply position for 2022-2027 is 5.2 years.**

7.99 We have concerns with numerous sources of the Council's supply and consider the five year supply position be substantially below five years in actuality, using either a 2021 or 2022 base date.

7.100 In determining the correct deliverable amount of five year supply, one must firstly consider what constitutes a 'deliverable' site.

7.101 The 2019 NPPF updated the definition of a 'deliverable' site (within the Glossary at Annex 2), which has been carried through to the 2021 version. It is as follows:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years." (our emphasis).

7.102 Many of the sites fall within limb b) of the definition of deliverable and, from our review, it is clear that many of the sites included in the Council's supply do not have the necessary clear evidence to be considered deliverable. Furthermore, the Council's position statement is now out of date (using a 2021 base date) and a new statement will need to be prepared.

7.103 The Applicant intends to review any update that this produced to confirm our views on the extent of the Council's housing land supply. Overall, whilst the proposed development accords with the Development Plan and so the five year supply position is not determinative to its suitability, it is clear that there is a substantial need for both market and affordable housing in both Dacorum and in the former Aylesbury area of Buckinghamshire and that the application should be determined we consider the application should be determined against the tilted balance set out at paragraph 11d of the NPPF. This requires that when the policies which are most important for determining the application are out of date, permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Planning Balance

7.104 This section confirms that the proposals accord with Dacorum and Buckinghamshire (Aylesbury Vale area) Statutory Development Plans.

7.105 Where harm is identified this has been suitably mitigated by the proposals and residual harm does not outweigh the benefits of the proposals. The delivery of housing

provision alongside other complementary employment and community uses should be afforded due (substantial) weight in the determination of this planning application.

- 7.106 Dacorum Council has confirmed it does not have a five year housing supply and upon an initial assessment it is the applicant's view that Buckinghamshire (Aylesbury Vale area) does not have a sufficient five year supply. In the absence of a 5YHLS the NPPF, at paragraph 11(d) requires the decision-maker to consider whether the "most important policies" in the development plan are "out-of-date", thereby triggering the tilted balance if there are no policies in the NPPF which provide a clear reason for refusal (as referred to in Footnote 7).
- 7.107 In considering the tilted balance and other NPPF policies referred to in Footnote 7, the site is not located within an AONB however, the proposals have been assessed within the context of the Chilterns AONB (located approximately 1.3km to the south-east of the site) and Paragraph 176 of the NPPF which seeks to protect this landscape. Long term cumulative effects are identified to be limited to users of promoted routes along ridgelines within the Chilterns AONB. The LVA is robust in its assessment and considers after dark and cumulative impacts of the development, confirming a negligible after dark impact and moderate/minor adverse cumulative effects upon views from the Chilterns AONB. As such, there is no significant visual or landscape harm to the AONB that would alter the tilted balance or significantly or demonstrably outweigh the benefits of the development.
- 7.108 In considering the tilted balance and other NPPF policies referred to in Footnote 7, the site is located within 10km radius of one European ecological designated site, Chilterns Beechwoods SAC, and is within 2km radius of one nationally designated site, Tring Reservoirs SSSI. Advice has been sought from Natural England via its Discretionary Advice Service to ensure the scope of assessment (in terms of nitrogen deposition and recreational pressure upon these sensitive receptors) is robust. Through dialogue with Natural England, it is confirmed that air quality impacts upon the SAC are nugatory and can be scoped out of further assessment.
- 7.109 Further assessment has been carried out in accordance with NE's advice during the determination period of the original application and a shadow Habitat Regulation Assessment (sHRA) has been submitted in support of the re-submission. The sHRA identifies the Applicant's commitment to securing offsite SANG including its management in perpetuity and contributions to be made towards SAMM. The detailed arrangements of these commitments will be agreed in consultation with Natural England and secured by S.106 agreement. On the basis that any harm arising from the development on habitat sites (as identified by paragraph 181 of the NPPF) is required to be mitigated to satisfy the Habitat Regulation, and that a mix of on and offsite measures will be applied, there is no clear ecological harm that would alter the tilted balance or significantly or demonstrably outweigh the benefits of the development.
- 7.110 The proposals are confirmed to be in accordance with policies contained within the Statutory Local Development Plan(s) therefore, should be approved without delay. Notwithstanding the Applicant's position, if the decision maker identifies some conflict with the Local Development, we consider the tilted balance to be engaged. The

benefits of the proposal significantly and demonstrably outweigh any harm arising from the development and, in accordance with the presumption in favour of sustainable development, should be approved without delay.

Community Provision (and Draft Heads of Terms)

- 8.1 Policy S5 of the VALP states that new developments must provide appropriate transport, utility, community and green infrastructure (on and off site) which further support sustainability objectives outlined in the Local Plan. Policy CS23 of the Dacorum Core Strategy states that all new development will be expected to contribute towards the provision of social infrastructure.
- 8.2 Sections 3 and 4 of this report set out the extensive information gathering, an analysis of the local population and business context and stakeholder engagement that has taken place to inform the development.
- 8.3 Through this exercise, the proposed non-residential elements of the development, including the transport Mobility Hub are identified to be appropriate and will support the overall sustainability of the proposed new village. This is because there is an identified demand for a particular service/facility; there is appetite from commercial operators to serve the site (such as transport asset providers); and/or – in the event that a commercial operator is not initially secured – there is a commitment from the applicant (as identified within the Draft HoTs below) to secure a funding for a period of time for the operation of community facilities.

Community Infrastructure Levy

- 8.4 The Community Infrastructure Levy came into effect within Dacorum Borough Council in 2015 and its CIL Charging Schedule confirms that the application site is liable to a rate of £150 per square metre (falling within 'Zone 2' charging area). CIL payments will contribute towards (inter alia) the delivery of education, transport, social and health infrastructure.
- 8.5 The Aylesbury Vale area of Buckinghamshire Council does not currently have a CIL charging schedule.

Planning Obligations

- 8.6 Due to the scale and nature of the development proposed it is considered that mitigation in the form of planning obligations is likely to be required. Such mitigation will be secured by means of Section 106 of the Town and Country Planning Act 1990 (as amended).
- 8.7 Negotiations with the LPAs will be undertaken and concluded during the determination of the application proposal. At this stage, the Applicant considers that the following matters will need to be addressed as part of the Proposed Development and/or through appropriate financial contributions or the provision of works 'in-lieu' of financial contributions:
- **Affordable housing** (including 25% First Homes) – Dacorum Council requires a minimum of 35% affordable and VALP requires a minimum of 25% affordable. Respective policies will be met within the spatial extents of the development which falls within each local authority area.

- **Transport and Highways**, including a commitment to deliver improvements along Lukes Lane and Long Marston Road and implement measures contained within a detailed Travel Plan. A further commitment, outside of the S.106 is a CoWheels Car Club contribution of c. £36,000 (to be paid over 3 years, to start a year after 1st occupation); and a Bus diversion contribution of c.£803,400 during the first 5 years of the service being in operation.
- **Public Open Space**, including the quantum of POS to be provided onsite, submission of a POS Management Strategy and specification of play. Financial contributions (proportionate to the scale of development) to be made toward the provision of offsite sports facilities. The Parks and Recreation Officer comments made during consultation of the original application form the starting point for discussions relating to POS contributions and standards. This includes a commuted sum (c.£58,800 per hectare) towards future maintenance, should the open space scheme be transferred to the Parish Council.
- **Primary Education Provision**, including the gifting of land to the Education Authority for the delivery of a 0.5FE school, safeguarding of land for its potential expansion to 1FE and a contribution towards the build cost of the school, proportion to the number of pupils yielded from the development. Build costs as at July 2022 were provided within the LEAs response to the original application as follows, and are the starting point for calculating the appropriate scale of contributions.

Provision Type	Flats			Houses			
	1 Bed	2 Bed	3+ Bed	1 Bed	2 Bed	3 Bed	4+ Bed
Primary	£613	£4,110	£6,918	£1,378	£5,131	£10,542	£14,677
Secondary	£296	£1,568	£4,232	£621	£2,515	£7,842	£12,814
Special	£0	£324	£755	£108	£432	£1,187	£1,942

- **Health**, including monies requested by the Hertfordshire and West Essex Integrated Care Board, seeking £413,440 towards the expansion, reconfiguration and possible relocation of existing GP facilities.
- The **Local Centre and REH Facilities** to be delivered by the developer at a trigger point to be agreed with the Local Authorities; submission of a marketing and management plan setting out the steps to be carried out to identify a management company or community entity that is to take on the operation of community facilities; and financial contributions to be agreed to be paid to the secured management entity during the early years of establishment.

8.8 The Applicant is committed to secure the services and facilities, as proposed, and is open to discussion regarding ‘seeding contributions’ that could assist a community body or group (such as the Parish Council) with the initial start-up and operation of provisions such as the community shop.

8.9 Outside of the s106 contributions (but potentially secured by way of the Travel Plan), the Applicant is committed to delivery of the Mobility Hub and bus service which include contributions direct to the operator for the first 3 to 5 years of its service.

- 8.10 We welcome early discussions with the Council(s) to secure these provisions through suitable planning terms by way of planning conditions and the s106 legal agreement, including cross-boundary considerations and how differing LPA requirements/policies are written into the planning obligations. This demonstrates that the proposals are in compliance with Policies S5 and CS23.

Summary and Conclusions

- 9.1 This Planning Statement is submitted on behalf of Ainscough Strategic Land, to accompany the re-submission of an outline planning application for the demolition of existing buildings to enable the delivery of a new village known as Upper Wellington on land at the former Marsworth Airfield.
- 9.2 The assessment confirms that the site is in a sustainable location and is defined as previously developed land.
- 9.3 This statement assesses the proposals against the Statutory Development Plans and confirms that the development is in accordance with these policies. It also takes into consideration comments raised by statutory consultees during the determination period of the original application.
- 9.4 In the circumstance where a neutral balancing exercise is carried out by the decision maker, the assessment concludes that where harm is identified this has been suitably mitigated by the proposals and residual harm does not outweigh the benefits of the proposals. The delivery of housing provision alongside other complimentary employment and community uses (which will benefit new residents and support other nearby villages) should be afforded due (substantial) weight in the determination of this planning application.
- 9.5 Dacorum Council has confirmed it does not have a five year housing supply and upon an initial assessment it is the applicant's view that Aylesbury Vale does not have a sufficient five year supply. Furthermore, Dacorum's adopted development plan is out of date (on the basis it was adopted in 2013 and its baseline SHMA evidence pre-dates the NPPF). In the absence of a 5YHLS the NPPF, at paragraph 11(d) requires the decision-maker to consider whether the "most important policies" in the development plan are "out-of-date", thereby triggering the tilted balance if there are no policies in the NPPF which provide a clear reason for refusal.
- 9.6 If the tilted balance is applied to decision making, the assessment confirms there are no clear reasons for refusal, the proposed development comprises sustainable development and offers a wide range of economic, social, and environmental benefits as follows:
- Around **320 new homes** that contribute to the need for housing in Buckinghamshire and Dacorum. In accordance with local policies H1, H5, H6, CS18 and CS19, the development will provide a mix of house types and sizes, including affordable housing, wheelchair accessible housing, First Homes and opportunities for self-build.
 - **Efficient re-use of an underutilised brownfield site**, as opposed to greenfield development, the principle of which is encouraged by local policy (specifically VALP Policies S1 and S7) and national policy. Central Government's 'brownfield first' pledge has been further strengthened through the Secretary of State's recent statements and proposed planning reforms set out within the Levelling Up and Regeneration Bill.

- Environmental benefits include (inter alia) the **decontamination of the site** and introduction of **ecological and landscape enhancements**, including SuDS, biodiversity net gains (10%) and significant tree and hedgerow planting.
- Climate change adaption measures and measures to reduce carbon emissions, including an **all electric energy strategy** thought the use of Air Source Heat Pumps, and new homes to achieve the Interim Future Homes Standards criteria.
- Accessibility benefits include provision of a **mixed-use development which will encourage the internalisation of typical day to day trips**; 100% electric vehicle charging; **improvements to existing footways and carriageways** to enhance accessibility to/from the site; **extension of the local bus service**; and a **transport Mobility Hub** providing residents with alternative transport modes for onward journeys.
- Significant Social and Economic Benefits, including:
 - A site capable of accommodating up to a **1 form entry primary school** with playing field, which could be used by the community outside of school hours.
 - A new local centre providing facilities including a community shop/café, retail/business units, and a **multi-function community building** which can be utilised as meeting space as well as leisure/sports uses.
 - **Public Open Space which promotes social health and wellbeing**, including a community orchard, community garden, Multi-Use Games Area, play area and a heritage or trim trail within the site's green corridors which draws upon the sites history **and creates a sense of place**.
 - A new rural enterprise hub, providing **valuable trade space for small and rural enterprises** and enhancing employment opportunities within the local area.
 - Approximately **80 FTE jobs** per annum **during construction**, and **55 FTE direct jobs** per annum upon operation, within the primary school, local centre and rural enterprise hub.
 - Around a **£51 million GVA** contribution to the wider economy during construction. Including a **£4.7 million GVA** contribution to the local and wider economy during operation.
 - A gross resident income of **£12 million**, which will increase **local spending power**.
 - Around £800,000 in Council Tax payments annually and £90,000 in Business Rates to help deliver public infrastructure and services within the locality.

9.7 In conclusion, whether a neutral balance or tilted balance be engaged to the decision making process, the proposals comprise a number of social, economic and environmental benefits which significantly and demonstrably outweigh any harm

arising from the development and, in accordance with the NPPF, should be approved without delay.

Appendix 1 – SoS Decision 1996 (252761)



GOVERNMENT OFFICE
FOR THE SOUTH EAST

RPS Nigel Moor,
Centurion Court,
85 Milton Park,
Abingdon,
Oxfordshire
OX14 4RY

Your Ref: DW/JAL/9307
Our Ref: APP/J0405/A/95/252761

Berkshire, Oxfordshire
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Area Team

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Tel: 01483 882 310
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6 August 1996

Dear Sirs,

**TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 78
APPEAL BY SKIM MILK SUPPLIES LTD PENSION TRUSTEES
PROPOSED HOUSING DEVELOPMENT, MARSWORTH CAMP, LONG MARSDEN
ROAD, MARSWORTH**

It has been drawn to my attention that there is a typing error in paragraph 11 of the letter of 29 July 1996 containing the decision on the above appeal. The third sentence of this paragraph should read:

"However, he agrees with the Inspector, for the reasons given in paragraphs 11.11-11.14 of his report, that the benefits of the proposal do not outweigh the policy objections as stated above to this proposed residential development in the countryside."

Any inconvenience caused by this error is regretted.

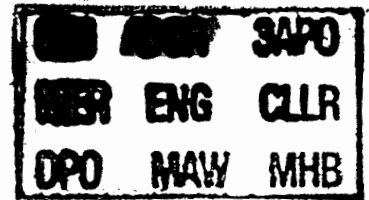
This letter is being copied to everyone who was sent a copy of the decision letter.

Yours faithfully,

MISS A GERRY



GOVERNMENT OFFICE
FOR THE SOUTH EAST



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Your ref: DW/JAL/9307
Our ref: APP/I0405/A/95/252761

Tel: 01483 882⁴⁰⁷
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GTN: 8011

Dear Sirs

29 JUL 1996

TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 78
APPEAL BY SKIM MILK SUPPLIES LTD PENSION TRUSTEES
APPLICATION NOS: 94/0041/AOP (Aylesbury Vale)
4/1684/93/FL (Dacorum)

1. I am directed by the Secretary of State for the Environment to say that consideration has been given to the report of the Inspector Mr P D Wilson DipArch DipTP RIBA MRTPI who held a local inquiry into your clients' appeal against the decision of Aylesbury Vale District Council to refuse outline planning permission for 100 residential dwellings, affordable housing, recreation use and public open space on land at Marsworth Camp, Long Marston Road, Marsworth.
2. The Inspector, whose conclusions are reproduced in the annex to this letter, recommended that the appeal should be dismissed. A copy of his report is enclosed.
3. The Secretary of State notes that the greater part of the appeal site is in Aylesbury Vale District but that part of the site falls within Dacorum Borough. On 10 March 1994, Dacorum Borough Council resolved that authority to determine the whole application be given to Aylesbury Vale District Council.
4. The Secretary of State notes that the usual procedure for notifying interested persons was not followed in this case. However, bearing in mind the amount of local publicity undertaken, the number of written representations and the submissions made at the inquiry on behalf of local residents, he is satisfied that no substantial prejudice has been caused by the Council's failure to carry out the normal notification of owners, and that adequate publicity has been given to the appeal.
5. In deciding this appeal, the Secretary of State has had regard to section 54A of the Town and Country Planning Act 1990. This provision requires him to determine the appeal in accordance with the development plan unless material considerations indicate otherwise. In this

case, at the time of the inquiry, the development plan comprised the Buckinghamshire County Structure Plan (BCSP) - Incorporating Alterations 1,2,3 and 4 and the Aylesbury Vale Rural Areas Local Plan 1995 (RALP) and, for that part of the site within Hertfordshire, the Hertfordshire County Structure Plan 1991 and the Dacorum Borough Local Plan 1995. However, the New Buckinghamshire County Structure Plan 1991-2011 (NBCSP) was adopted on 28 March 1996 and, with the RALP and the relevant Hertfordshire plans, now forms part of the development plan for the purposes of determining the appeal. The Secretary of State notes that the submissions at the inquiry took into account the imminence of the adoption of NBCSP and were concerned with its policies rather than with those in BCSP. He agrees with the parties that the most relevant policies in this case are policy OC3 of the NBCSP and policy RC8 of the RALP, both of which relate to the re-use of major existing sites in the countryside.

6. The Secretary of State considers that the main issues in this case are the impact of the development on the rural area, the impact on the local road network of the additional traffic generated by the development and the impact on the listed canal bridge at Marsworth of the proposed traffic-light scheme at the bridge. If the Secretary of State finds that the scheme would be harmful, he has to consider whether there are any other material considerations which indicate that permission should be granted.

7. In relation to the effect of the proposal on the rural area, the Secretary of State notes that both the development plan policies cited above stipulate that the impact of redevelopment should be no greater than the existing use. Although the site, at present, contains buildings in poor condition, the visual impact is not severe because there is an absence of intense activity and because the site's former use as a military airfield is apparent. While the footprint of new buildings on the site may be similar to that of existing structures, the appeal proposal would introduce a sizeable residential development into a rural area where there are few settlements and where development tends to be small-scale and dispersed. The development would be isolated in the countryside and poorly-related to existing settlements. The Secretary of State takes the view that the proposed new housing and associated activity would have a considerable impact on the character and appearance of the local environment and would have a greater impact on the countryside than the existing use. Accordingly, notwithstanding that the site is redundant, he considers that the proposal conflicts with national and development plan policies on development in the open countryside.

8. As regards highway matters, the Secretary of State notes that the roads in the vicinity of the appeal site tend to be irregularly aligned and narrow in places. He agrees with the Inspector that, although the additional traffic would have a harmful effect on the rural character of the area, there would not be a serious and unacceptable risk to highway safety. However, he gives greater weight than the Inspector with regard to the degree of importance to be attached to the lack of a continuous footway on the road between the appeal site and Marsworth village. Given the remoteness of the appeal site from existing settlements and services, he considers that this is a factor which would militate against the Government's policy that developments should be sustainable and that reliance on the private motor car should be reduced and serves to reinforce the Inspector's overall view in paragraph 11.24 of his report that the appeal proposals would be in conflict with the principles of sustainable development.

9. In terms of the impact of the proposed traffic-light scheme on the listed bridge at Marsworth, the Secretary of State accepts the Inspector's view that the proposal would not impinge unacceptably on the setting of the listed building.

10. The Secretary of State has proceeded to consider whether the harm resulting from the development is outweighed by any other material considerations, the principal one of which in this case appears to be the question of housing land supply. He notes that differing methods of calculating the supply have been submitted, ie for the rural areas only and for the district as a whole. Paragraph 54 of PPG3 states that when dealing with specific planning applications the relevant area to be considered for assessing land supply will normally be the whole of an administrative district, but where areas other than districts are used, reasons for this approach will need to be given. The Secretary of State notes that the division of the district into two parts for the purposes of land supply calculations derives support from BCSP and RALP and as such must be given due weight. However, the housing policies in NBCSP provide for a specific allocation within or adjoining Aylesbury but do not otherwise give guidance as to the location of sites between town and country. Future land availability assessments will need to be made on the basis of the provision in NBCSP and, for the purposes of this appeal, the Secretary of State has given greater weight to the assessment for the district as a whole than for rural areas only. On this basis, he observes that the supply, even using the Council's estimates, is less than 5 years. He further notes that preparation of the district wide Local Plan is at a very early stage and that there is little evidence of action being taken to identify additional sites. Nevertheless, having regard to the harm to the countryside that would result from the appeal proposals, the Secretary of State agrees with the Inspector that the need to identify additional sites is not so pressing as to justify the use of the appeal site for housing purposes.

11. The Secretary of State recognises that benefits would accrue from the proposal. These include the re-use of a redundant, rather than a "green-field" site, the improvement of the site by the removal of derelict structures and the removal of possible contamination, the provision of affordable housing and the provision of open space. However, he agrees with the Inspector, for the reasons given in paragraphs 11.11 - 11.14 of his report, that the benefits of the proposal do not outweigh the policy objections as stated above to this proposed residential development in the countryside. Accordingly, he has concluded that there are no material considerations in this case that would indicate that the development should be permitted contrary to the development plan.

12. Accordingly, for the above reasons, the Secretary of State accepts the Inspector's recommendation and hereby dismisses your clients' appeal.

Yours faithfully



MISS A GERRY
Authorised by the Secretary of State for
the Environment to sign in that behalf

Appendix 2 – Planning History Table

Application / Appeal Reference	Description	Decision Date	Decision
82/01346/AV	Overhead line	15 Dec 1982	Approved
86/00037/AV	Pre-delivery inspection and storage facility	28 Jul 1986	Approved
89/01297/AOP	Residential development comprising 155 dwellings	31 Aug 1989	Refused
94/00041/AOP	100 residential dwellings, affordable housing, recreation use and public open space	29 July 1996	Refused
94/00003/REF	100 residential dwellings, affordable housing, recreation use and public open space	6 Aug 1996	Appeal Dismissed
02/02409/ACL*	Use of land for the parking of heavy goods vehicles and the storage of industrial tanks	12 July 2004	Certificate Issued – Lawful Existing Use
02/02411/ACL*	Use of land for the storage and repair of Generators	12 July 2004	Certificate Issued – Lawful Existing Use
05/01876/AAD	Display of two letting agent boards	10 Oct 2005	Refused
05/02815/APP	Change of use of part Unit 15 from redundant agricultural building to B1 Use	23 March 2007	Approved
05/02817/APP	Change of use of part Unit 14 from redundant agricultural building to B1 Use	23 March 2007	Approved
06/00533/ACL	Continuation of the use of the north west corner of the site for the storage of concrete and other inert materials and storage of soils, storage of liquid feed products in the area between units 11 and 12, and storage of theatrical equipment in Unit 5.	26 Jun 2006	Certificate Refused – Lawful Existing Use
06/00099/REF	Continuation of the use of the north west corner of the site for the storage of concrete and other inert materials and storage of soils, storage of liquid feed products in the area between units 11 and 12, and storage of theatrical equipment in Unit 5	26 Oct 2006	Appeal Withdrawn
06/01800/ACL*	Use of Unit 5 for the storage of theatrical Equipment	7 Dec 2006	Certificate Issued- Lawful Existing Use
06/02691/APP 07/00047/NONDET	Change of use of agricultural and storage buildings to use as builders yard including the storage of builders materials (Units 20, 21, 22, 23, 24 and 30)	9 Jul 2008	Appeal Dismissed
07/00566/APP 07/00048/NONDET	Change of use of building (Unit 25) from agriculture to storage of vintage car parts, including occasional auctions of vintage car	9 Jul 2008	Appeal Dismissed

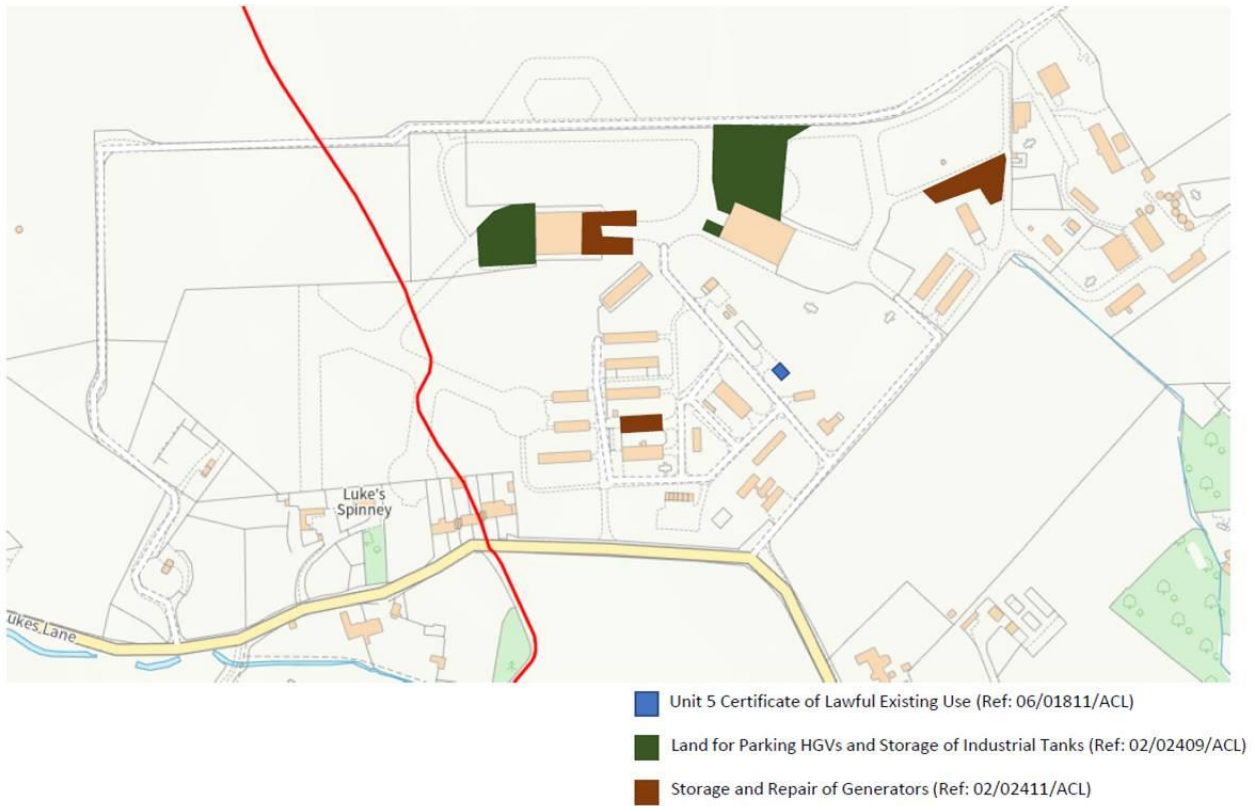
	parts		
07/00728/APP 07/00050/NONDET	Change of use to motor cycle training (retrospective). (Unit 4)	9 Jul 2008	Appeal Dismissed
07/00760/APP 07/00046/NONDET	Change of use of building to (B1) light industrial. (Unit 16)	9 Jul 2008	Appeal Dismissed
07/00843/APP 07/00049/NONDET	Change of use from agricultural workshop/store to storage for personal effects and a motor home. (Unit 13)	9 Jul 2008	Appeal Dismissed
07/01041/APP 07/00052/NONDET	Use of part of building as vehicle storage and restoration. (Unit 14)	9 Jul 2008	Appeal Dismissed
11/00082/ENFNOT	Appeal against Enforcement Notice without planning permission the change of use of land from agricultural workshop/storage to use for the repair and restoration of vehicles	10 May 2012	Enforcement Upheld – Notice Varied
11/00084/ENFOT	Appeal against Enforcement Notice without planning permission the change of use of land from agricultural to use for the storage of building materials within Uses Class B8 (storage/distribution centre use) of the Town and Country Planning (use Classes) Order 1987 ("Use Class B8) and the ancillary storage of a Mobile Home used for welfare facilities for employees	10 May 2012	Enforcement Upheld- Notice Varied
11/00085/ENFNOT	Appeal against Enforcement Notice without planning permission the change of use of land from agricultural to a Sue Generis Use as a Builders Yard and for the storage of Building Materials and Plant	10 May 2012	Enforcement Upheld – Notice Varied
11/00086/ENFNOT	Appeal against Enforcement Notice without Planning Permission the change of use of land from agricultural to use for the storage of vehicles, including but not limited to heavy goods vehicles (HGV's) and HGV trailers, within Use Class B8 and the construction of a hardstanding related to the unauthorised use	10 May 2012	Enforcement Upheld – Notice Varied
11/00087/ENFNOT	Appeal against Enforcement Notice without planning permission the change of use of the land from agricultural use to Sui Generis use for the training of motorcyclists and ancillary storage of motorcycles	10 May 2012	Enforcement Upheld – Notice Varied
11/00088/ENFNOT	Appeal against an Enforcement Notice without planning permission the change of use of the land from agricultural use to use for the repair and restoration of motor vehicles with ancillary storage and parking of motor vehicles within Use Class B2 (general industrial use) of	10 May 2012	Enforcement Upheld – Notice Varied

	the Town and Country Planning (Use Classes) Order 1987		
11/00089/ENFNOT	Appeal against an Enforcement Notice without planning permission the change of use of the land from agricultural use to use for the repair and restoration and storage of motor vehicles with associated storage of vehicle body parts	10 May 2012	Enforcement Upheld – Notice Varied
13/02632/APP	Change of use, refurbishment of existing retained buildings from agricultural storage and vehicle storage to B1 use (Business).	26 Sep 2014	Withdrawn
14/02554/APP	Installation of electricity generation plant	22 Oct 2014	Refused
15/00374/APP	Proposed change of use of land and existing buildings currently used for the purposes of agriculture, repair and storage of generators, storage of heavy goods vehicles, industrial tanks and theatrical equipment to B1 use facilitated through the refurbishment of identified existing buildings, demolition of other buildings, re-instatement of vehicular access to Long Marston Road and retention and restoration of land to agricultural use	10 Jul 2019	Refused
22/02189/AOP	Outline Planning permission for demolition of existing buildings, structures and hardstanding to enable the erection of up to 320 residential (Use Class C3), a primary school, a local centre comprising community facilities (Use Class F2) and a rural enterprise hub (Use Class E) together with a transport mobility hub, public open space, drainage, landscaping and ancillary infrastructure. New vehicular and pedestrian access off Long Marston Road with all other matters (including other means of access) reserved.	27 Oct 2022	Withdrawn

1.

* The location of the uses and operations which benefit from a Certificate of Existing Lawful Use are illustrated on the plan below.

Figure 1: Plan of Existing Lawful Uses (not to scale)



Appendix 3 – Stakeholder Consultation Briefing Note

Briefing

Upper Wellington

April 2022

Stakeholder Consultations – Sustainability Scoping Report (2019) Addendum

1. This briefing note has been prepared on behalf of Ainscough Strategic Land (ASL) to support the outline planning application to Buckinghamshire Council for the development of Upper Wellington, Marsworth ('the Site'). It provides an update to accompany the Sustainability Scoping Report prepared by Turley Economics in 2019 to support the site (then known as Marsworth Airfield).
2. Consultations were sought with a number of local stakeholders who operate as part of the social and community fabric of the local area. These were:
 - **Education:** Local education providers - the Diocese and School Place Planning Officers at Buckinghamshire Council as the Local Education Authority.
 - **Health:** NHS Clinical Commissioning Groups – NHS Buckinghamshire CCG and NHS Berkshire West CCG
 - **Business:** Representatives from business groups - Bucks Thames Valley Local Enterprise Partnership (BTVLEP) and Bucks Business First (BBF).
3. The consultation questions posed are included in Appendix 1.
4. The intention of the consultation exercise was to test the development proposals with local stakeholders. This led to changes to the Masterplan including:
 - Scaling down of Remote Working Hub, replaced by more Community Centre and Meeting Space;
 - Rural Enterprise Hub to include commercial kitchen space;
 - Confirmation that a Primary School will be included on site.

Education

4. A consultation was held with Buckinghamshire Council and the Diocese of Oxford on Microsoft Teams on 16th February 2022.¹
5. The following were the key themes that emanated from the meeting:

¹ Individuals present from Diocese of Oxford and Buckinghamshire Council: Jane Maharry, Gordon Joyner and Stephen Chainani

- a. The nearby Primary School to the site, Marsworth School, is currently operating in a very tight space in terms of the potential to expand. Pupil numbers fluctuate quite considerably, and there may previously have been questions over the school's viability because of this.
- b. It was advised that a Primary education facility should be included within the Masterplan due to the population increase that the new homes would bring, which would considerably exceed the capacity at the local school.
- c. Buckinghamshire Council has advised that a 0.5 form entry school should be provided initially, which can be expanded to make a 1 form entry primary school to allow for growth or the relocation of Marsworth school. It was also advised that it is unlikely that the Department for Education (DfE) would approve a 0.5 form entry school, as fluctuations in population mean it will result in low numbers. A 1 form entry school would be more sustainable and make the school more viable.

Health

6. Numerous attempts were made to contact NHS Berkshire West CCG and NHS Buckinghamshire CCG for consultation; however, a response was not forthcoming.²

Business

7. A meeting with the Managing Director of Buckinghamshire Business First (BBF)³ was held on Microsoft Teams on 16th March 2022:
 - a. BBF liase with c. 14,000 businesses in Buckinghamshire and tend to provide a strong economic voice on planning matters. BBF are a top 5 Local Enterprise Partnership (LEP) in the country in terms of engagements with businesses in their area.
 - b. BBF indicates that the location would receive interest from small enterprises, given the site's proximity to Cheddington Railway station and the proposed mobility hub.
 - c. BBF confirmed that, subject to moving the enterprise hub to within the Buckinghamshire authority boundary, they would support the scheme.
 - d. There are a few businesses known to BBF currently at the Former Marsworth Airfield which tend to be practical / trade businesses.
 - e. There is a deficit of small industrial units for trades within Buckinghamshire.
 - f. There is also a shortage of commercial kitchen space which can operate as 'dark kitchens' and help to reduce travelling distances in food supply chains. BBF believe there is significant demand for these spaces, that are clean and can be advantageous within a housing site. This

² Initial email sent to NHS Buckinghamshire CCG 10/02/2022. Initial email sent to NHS Berkshire West CCG Primary Care team on 10/02/2022, Response received from PA to the Interim Director of Primary Care, who shared a contact in NHS Oxfordshire CCG who suggested would be a suitable contact for this matter. However, a response was not forthcoming from this individual referred to. Follow-up emails sent on 15/02/2022, 21/02/2022, 23/02/2022, 03/03/2022.

³ Philippa Batting

may also suit the local traditions in agriculture etc, with a lot of nearby land involved in primary production of food.

- g. BBF currently run the LEADER programme which offers grants to small and medium-sized rural businesses: Farmers wishing to diversify; tourism projects; community groups; foresters and other rural enterprises. BBF noted that further support would be gained if a general theme of respecting the rural nature of the local economy was clear in proposals. This may include accommodating small-scale enterprises which relate to the local food supply chain and agriculture.
- h. There is a good network of Remote Work Hubs around the county, including at the University of Buckinghamshire and in Aylesbury. However, these spaces are struggling to make ends meet and aren't getting appropriate uptake.
- i. The biggest need for co-working spaces is in areas where there are large amounts of young people who live in flats and therefore don't have work from home space. However, meeting rooms tend to be advantageous to the whole community and would suit a community such as this.
- j. BBF also discussed the potential for some of their own operations to be based on the site, which may act as a catalyst for other businesses to move into the area.

Appendix 1

Questions for Education Consultation

1. What is your general perspective of the current education provision in the area, do you see a specific need for further education space?
2. Are there any specifications or general guidance from the Church of England that might inform how the education space is developed?
3. Do you have any specific timeframes for the relocation, or how it might operate in transition?
4. By being able to have a new site with the potential to expand, does it help safeguard the future of the school?
5. Are there any constraints for development on the school's existing site?

Questions for Health Consultation

6. What additional health provision is needed to accommodate demand arising from the development?
7. Would Member Practices welcome provision of a satellite GP clinic at this location to serve the existing and new community?
8. It is envisaged that the developer will deliver the community building and include a room/space (to a suitable specification) for a clinic. It is anticipated that the building will then be gifted to a community group with a pot of money set aside for its operation/maintenance thereafter. However, we are open to alternative suggestions taking on board the CCGs experience on the practicalities of operating clinical space.
9. What size of building space would the CCG/Member practices require to ensure its suitable function?
10. If a satellite GP clinic is not supported, is there an alternative provision that could be suitably accommodated within the site to accommodate demand arising from the development?

Questions for Business Consultation

11. What sort of space or facilities do businesses currently find hard to find in the local area?
12. We note there are higher proportions of small to medium sized enterprises and microbusinesses in the local area, how do these operate or work in partnership? (Hopefully leading into how a Rural Enterprise Hub may be beneficial here)

13. In the context of the past two years, are there any particular challenges that have threatened local prosperity, or been an impediment to small and rural businesses?

Contact

Jack Sanderson
jack.sanderson@turley.co.uk

29 March 2022

AINA3004

Appendix 4 – Buckinghamshire EIA Screening Opinion



**Buckinghamshire Council
Aylesbury Vale Area**

TOWN AND COUNTRY PLANNING ACT 1990

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017
("the regulations")**

SCREENING OPINION UNDER REGULATIONS 5 & 6

Relating to Application No:	21/03633/INF1
Location:	Marsworth Airfield South Site Long Marston Road Marsworth Buckinghamshire HP23 4FE
Site area:	13.6 ha
Description of development:	Development at the above location for up to 320 dwellings, primary school, local centre and enterprise hub
Documents submitted:	EIA Screening Report

Reason for screening opinion:

The development proposed falls within the description at paragraph 10(b) (urban development projects) of Schedule 2 of the regulations and exceeds 5 ha and includes more than 150 dwellings in size. Therefore, the Council considers that the development proposed is Schedule 2 development within the meaning of the regulations.

Relevant criteria (Schedule 3 of the regulations):

i) Characteristics of the development

- a. The size and design of the whole development – the site extends to 13.6 hectares and proposes:
 - 320 dwellings;
 - Remote working hub (Use Class Sui Generis) – 246sq.m;
 - Local centre – community shop – 209 sq.m
 - Commercial services – 298 sq.m
 - Remote enterprise hub – 1,034 sq.m
 - 3.9 ha public open space

The development will see the removal of the majority of the existing buildings with the exception of two blast shelters which may be retained for heritage value and this will include the stripping of harmful materials including asbestos in accordance relevant guidance and legislation. The site will be remediated given its historical land use as an airfield and the potential for ground contamination.

The number of residential units and the creation of a village centre including the school and commercial premises would have an urbanising effect in the locality. This will result in a physical impact upon the appearance of the countryside which can be assessed as part of the planning application. The proposal is likely to result in adverse impacts in terms of traffic generation, emissions and noise.

- b. The accumulation with other existing development and/or approved development - the site is relatively isolated, in considering the development with other developments in the area is unlikely to result in combination effects. The impact of the development would be localised to the highway network, appearance of the countryside in this location and to the ecological and biodiversity value of the site.
- c. The use of natural resources, in particular land, soil, water and biodiversity - there will be a loss of open land and local impact on ecology as a result of development in this location, however, this is not considered to be a significant environmental affect given that the site is not sensitive nor will the development affect a "Sensitive Area" as defined in the Regulations. Proposals will be expected to enhance the biodiversity value of the site and to protect existing landscape features in accordance with planning policy.
- d. The production of waste - the construction of the development can be expected to generate waste as part of the construction phase and during the operational phase.
- e. Pollution and nuisances – nuisances ordinarily associated with residential development such as construction noise would be expected. The main impact arising from both construction and operational phases is that associated with traffic generation, with larger vehicles at the operational phase likely.
- f. The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge – the project is not one that is expected to generate any effects in this regard.
- g. The risks to human health (for example, due to water contamination or air pollution) – short term effects on air quality could arise during construction; the proposal includes the use of sustainable urban drainage systems which would be anticipated to deal with surface water drainage etc.

ii) Location of the development

- a. The environmental sensitivity of geographical areas likely to be affected by development with regard to:
- i. Existing and approved land use – The existing site comprises a disused airfield in an early state of colonisation by grassland. The use of existing buildings on site is limited (disregarding unauthorised uses). The impact of the proposed development is likely to have harmful impacts in terms traffic generation, noise and pollution.
 - ii. Natural resources – the site has a number of existing natural resources, including boundary hedges / trees and grassland. The site lies in flood zone 1.
 - iii. Absorption capacity of the natural environment – the site is located in relatively isolated location in the countryside. There are few views from the wider area as these are generally interrupted by natural features. The site can be seen from Long Marston Road. There are no public footpaths on the site itself though there is a public footpath to the south east of the site between Fiddlers Green and the site, but views of the site are limited. The Marsworth Conservation Area is located 0.5km to the south of the site. The site has archaeological potential with a medieval settlement nearby. The site lies in the SSSI Impact Zones for Tring Reservoirs, Pitstone Quarry, Chiltern Beechwood SAC and Great Crested Newt Impact Zone. The mature trees are likely to contribute to the biodiversity of the site.
 - iv. Relative abundance, availability, quality and regenerative capacity of natural resources – the site itself does not contain any specific or unique features nor is it subject to any specific designations in this regard.

iii) Types and Characteristics of the potential impact

(In relation to criteria in i and ii above with regard to impact on factors specified in regulation 4(2)¹ taking into account the following):

- a. Magnitude and spatial extent
- b. Nature of impact
- c. Transboundary nature of impact
- d. Intensity and complexity of impact
- e. Probability of impact
- f. Expected onset, duration, frequency and reversibility of impact
- g. Cumulation with impact of other existing / approved development
- h. Possibility of effectively reducing the impact

- 1) Population and human health** – The site lies in a relatively isolated location in the countryside. The development is not anticipated to have any significant effects on the local or wider population proposed services and additional facilities required are expected to be provided for through the development itself or by necessary and

¹ Regulation 4(2) identifies the following factors – population and human health; biodiversity; land, soil, water, air and climate; material assets, cultural heritage and the landscape; the interaction between these factors;

appropriate contributions. The scheme includes areas of open space to contribute to health and wellbeing and will provide for walking / cycling connections as well as a proposed school and enterprise hub. The development, whilst it would result in a local impact which would be expected to be addressed through the planning application, it is not anticipated to have any significant impact on the wider community or human health.

- 2) **Biodiversity** – having regard to the ecological value of the site including that part which lies within the SSSI Impact Zones for Tring Reservoirs, Pitstone Quarry, Chiltern Beechwood SAC and great crested newt impact zone, it is considered that the likely impacts would be localised. The development falls within categories of concern. An Ecological Impact Assessment is required in order to identify, quantify and evaluate potential effects of development related or other proposed actions on habitats, species and ecosystems.
- 3) **Land, soil, water, air and climate** – Anticipated effects on air quality during construction will be short term and controlled by well-defined mitigation / control measures; such measures could also be applied at the operational stage to minimise such impacts / effects on water, air and climate. The main likely impacts will be those associated with the traffic generated by the project, both at construction and operational phase. Those related to construction phase will be short term and effects of both phases can be controlled / mitigated through management plans and travel plans. The overall increase in traffic levels is considered to have an adverse local impact, such impacts would need to be considered in greater detail at the application stage.
- 4) **Material assets, cultural heritage and the landscape** – the project would result in a permanent change to the site with the introduction of built development. These mainly local impacts would not be significant (in EIA terms). It would be seen as a significant intrusion of the surrounding countryside. The built element of the project would include new planting. No significant impacts on cultural heritage are anticipated with there being no inter-visibility between the site and the Marsworth Conservation Area, however these matters will be considered in further detail as part of the planning application. The archaeological potential of the site would need to be further considered at application stage.
- 5) **Interaction between the above factors** – these effects are unlikely to be significant given the nature, magnitude and spatial effect of the identified impacts.

Conclusion and Recommendation

In the Council's opinion, having taken into account the criteria in Schedule 3 of the regulations, the development would not be likely to have significant effects on the environment by virtue of factors such as size or location. Accordingly, it is the Council's opinion that the proposed development is not "EIA Development" within the meaning of the 2017 Regulations.

The determination of this application falls within the scope of
Officer delegated powers

YES

DATE: 09/11/2021

SIGNED: *Zenab Hearn*

PROFESSIONAL CHECK:

AGREE RECOMMENDATION:

DATE: 12th November 2021

OFFICER: *Sarah Armstrong*
Planning Team Leader

Appendix 5 – Dacorum EIA Screening Opinion

Date: 26th October 2021
Officer: Robert Freeman
Phone: 01442 228 663
Email: robert.freeman@dacorum.gov.uk
Reference: 21/03403/SCE

Chloe Patel
Turley
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Request for screening option (environmental impact assessment)

Reference: 21/03403/SCE
Proposal: REQUEST FOR EIA SCREENING OPINION - FORMER MARSWORTH AIRFIELD
Address: Marsworth Airfield Lukes Lane Gubblecote Hertfordshire HP23 4QH

Dear Sir/Madam

Thank you for your request for a formal Screening Opinion under the terms of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), wherein the Local Planning Authority must give its opinion as to whether or not formal Environmental Impact Assessment (EIA) is required. Below I set out the Council's considerations.

Yours sincerely,

Robert Freeman

Lead Planning Officer
Development Management
Dacorum Borough Council

Dacorum Borough Council Development Management

**The Forum
Marlowes
Hemel Hempstead
Herts
HP1 1DN**



Reference: 21/03403/SCE

Proposal: REQUEST FOR EIA SCREENING OPINION - FORMER MARSWORTH AIRFIELD

Address: Marsworth Airfield Lukes Lane Gubblecote Hertfordshire HP23 4QH

Screening Opinion

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

SCREENING OPTION IN RELATION TO THE PROPOSED DEVELOPMENT OF LAND AT MARSWORTH AIRFIELD FOR UP TO 320 DWELLINGS, A 0.5 FORM ENTRY PRIMARY SCHOOL, LOCAL CENTRE AND RURAL ENTERPRISE HUB

SITE DESCRIPTION

Marsworth Airfield is located to the north east of Wilstone and to the north of Marsworth village. It comprises 13.6 hectares (ha) of land comprising a former airfield and associated infrastructure. It is primarily located within the administrative area of Buckinghamshire Council (and formerly Aylesbury Vale District Council) albeit the south western corner of the site is located within Dacorum. The site is accessible from Lukes Lane, Gubblecote and Long Marston Road. The area comprises a large area of previously developed land within the designated Rural Area.

PROPOSALS

The proposals incorporate the following works:

1. The construction of some 320 homes
2. A primary school and associated playing fields (capable of meeting a single form of entry)

3. A remote working hub comprising some 264m² and providing workstations for up to 40 people. This space would be adaptable and could be used as leisure space outside working hours,
4. A Local centre including a community shop (209m²) and commercial units (298m²)
5. A remote enterprise hub comprising some 1034m² of business floorspace falling within Use Class E(g)
6. 3.9 ha of public open space.

CONSIDERATIONS

The aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.

A screening opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as to whether an Environmental Impact Assessment (EIA) is required in respect of the above proposed development. A short EIA statement accompanies the application and a separate pre-application request has been registered setting out details of the proposed scheme under 21/03497/PREA.

The scheme appears to fall within the ‘urban development project’ category in Schedule 2 of the Regulations i.e. development type 10(b), which states:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

Indicative screening thresholds are set out in the National Planning Practice Guidance (NPPG) at Paragraph: 058 Reference ID: 4-058-20150326. Column 3 from the indicative screening table states that in relation to urban development projects:

“Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

Sites which have not previously been intensively developed:

- (i) area of the scheme is more than 5ha; or*
- (ii) it would provide a total of more than 10,000sqm of new commercial floorspace; or*
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)”*

The NPPG identifies that when screening Schedule 2 projects, the Local Planning Authority (LPA) must take account of the selection criteria in Schedule 3 of the 2017 Regulations. Not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way. When the LPA issues its opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3. Where it is determined that the proposed development is not EIA development, the authority must state

any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment (see regulation 5).

Paragraph 18 of the NPPF states, *“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced. See the indicative thresholds and criteria. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development.”*

However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.”

The following addresses each of the points within Schedule 3:

1. Characteristics of development

(a) The Size and Design of the whole development

The existing site comprises a number of buildings associated with its former use as an airfield including aircraft hangers. Some of these buildings have been used more recently for commercial operations including van hire and light industrial purposes. The area of the site within the administrative area of Dacorum comprises the former runway to the airfield which has been colonised by grass and other vegetation. The majority of buildings on the site are located within Buckinghamshire.

The development will see the removal of the majority of the existing buildings with the exception of two blast shelters which may be retained for heritage value and this will include the stripping of harmful materials including asbestos in accordance relevant guidance and legislation. The site will then need to be remediated given its historical land use as an airfield and the potential for ground contamination.

The proposals would comprise a mix of residential, commercial, education and leisure uses however each individual component would be significantly below the size thresholds identified in the NPPG. The cumulative impact of this development is still considered to be relatively modest in scale. The number of residential units and the creation of a village centre including the school and commercial premises would have an urbanising effect in the locality albeit one that is similar in scale to smaller surrounding villages. This will have a physical impact upon the appearance of the countryside which can be assessed through the application and is also likely to result in adverse impacts in terms of traffic generation, emissions and noise. The focus is on creating a sustainable village with appropriate facilities within an easy (20 mins) walking distance.

(b) the accumulation with other existing development and/or approved development

The applicant has analysed both the Dacorum and Buckinghamshire/Aylesbury Vale websites to identify a number of larger planning applications in the locality of the application site. The analysis is fairly comprehensive and concludes that the “in combination effects with the approved projects are largely considered unlikely, given the distance and separation from the site”

I cannot find any reason to disagree with this conclusion. The proposal is relatively isolated from surrounding development and the impact is likely to be localised to the highway network, appearance of the countryside in this location and to the ecological and biodiversity value of the site itself.

(c) The use of natural resources, in particular land, soil, water and biodiversity;

There will be a loss of some open land and some local impact on ecology as a result of development in this location, however, this is not considered to be a significant environmental affect given that the site is not sensitive nor will the development affect a “Sensitive Area” as defined in the Regulations.

The site is not located within the Chilterns Area of Outstanding Natural Beauty nor has it been assessed as comprising habitats with ecological importance. It is also unlikely to have any impact upon the nearest Air Quality Management Area (AQMA) Table 6.1 of the associated report assesses the Likely Environmental Effects on receptors including the Chilterns Beechwoods SAC (5km to the east) and the SSSI’s at Tring Reservoirs (1.4km south) and Pitstone Quarry (1.6km east) and draws conclusions thereon. Proposals will be expected to enhance the biodiversity value of the site and to protect existing landscape features in accordance with planning policy.

(d) the production of waste

The proposed development is unlikely to generate significant quantities of additional waste either in construction or through its operation that would result in a wider environmental concern.

(e) pollution and nuisances

The provision of a Construction Management Plan and Site Waste Management Plan can be regulated through standard planning conditions to ensure that local amenity is not significantly reduced. It is considered that the construction of the development will not significantly impact upon neighbouring residents and employees within the surrounding area. Any effects of construction are considered to be temporary and construction will not give rise to any significant environmental impacts that warrant an EIA. The overall impact of the development on air quality on the surrounding area as a whole is considered acceptable.

(f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

This is not likely to be associated with the proposed residential use of the site.

2. Location of development

(a) the existing and approved land use

The existing site comprises a disused airfield in an early state of colonisation by grassland and a built up area of the airfield comprising aircraft hangers, blast shelters etc. These have a physical impact upon the open character and appearance of the countryside in this location. The use of buildings for a range of commercial purposes has some harmful impact in terms of traffic generation, noise and pollution. The impact of the proposed development is likely to have similar environmental effects.

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

From the information presented the development would not affect the relative abundance, quality and regenerative capacity of natural resources in the area.

(c) the absorption capacity of the natural environment, paying particular attention to the following areas:

(i) wetlands, riparian areas, river mouths

N/A

(ii) coastal zones and the marine environment

N/A

(iii) mountain and forest areas

N/A

(iv) nature reserves and parks

N/A

(v) European sites and other areas classified or protected under national legislation

N/A

(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure

N/A

(vii) densely populated areas

N/A

(viii) landscapes of historical, cultural or archaeological significance

The site was formerly used as a Second World War airfield and the buildings on site remain from that use. These buildings will be largely demolished as part of the proposed scheme. The

buildings represent a spectrum of structures found on a typical airfield site (runways, control towers and hanger buildings), however the site also includes a number of buildings that post-date the Second World War. Many of the original features of the airfield to the north and north-west of the airfield have been removed and the land has returned to an agricultural state. As such the historical and cultural significance of the site has diminished.

3. Types and characteristics of the potential impact

(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);

The extent of the impact will be limited to the immediate area and local transport network.

(b) the nature of the impact

The nature of the impact would primarily relate to the effects on the population and human health, biodiversity, land, soil, air and water quality, heritage assets and landscape. These are common impacts associated with residential development which are well understood.

(c) the transboundary nature of the impact

There will be an impact on the interface with the adjoining land uses. These are not considered to be particularly sensitive uses. The effect of the development on these interfaces is mitigated through design measures such as noise barriers, landscaping and buffer zones to the extent that the affect would not be significant. The adverse visual impacts on these sensitive uses are considered to be moderate adverse residual effects.

(d) the intensity and complexity of the impact

The residual impacts are considered to be limited to visual amenity and traffic. These environmental impacts are not considered to be significant or wide ranging in this case and in the context of the existing and committed development of the locality.

(e) the probability of the impact

There is a high probability of a low or moderate adverse visual impact as a result of the development. Such matters will be assessed through the planning application process.

(f) the expected onset, duration, frequency and reversibility of the impact

The impact would pertain at all times during the existence of the development.

(g) the cumulative impact with the impact of other existing and/or approved development

It is not considered that the cumulative impact, when considering recent local developments and site allocations, would create a significant environmental impacts.

(h) the possibility of effectively reducing the impact

The supporting information provides a Table of the Likely Environmental Effects of development and the requirement for mitigation. The impact of development can be

significantly reduced through appropriate mitigation both within the design process and through the subsequent construction and operation.

Consultation

It appears likely from my discussions with Buckinghamshire Council that they are likely to adopt a screening opinion to the effect that EIA is not required. I agree with this view.

Summary

It is considered that the proposal would not lead such a significant impact to the environment, in accordance with the three criteria set out in Schedule 3 of the Regulations. Therefore, it is not felt that an EIA is necessary.

CONCLUSION

It is concluded that the proposed works are unlikely to have significant effects on the environment when assessed under the selection criteria outlined under Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Accordingly, an Environmental Impact Assessment is not required and a screening opinion should be adopted to this effect.

Appendix 6 – Statutory Consultee Comments

AINA3004 Upper Wellington – Buckinghamshire Council (Aylesbury Vale)

Statutory Consultee Comment Tracker and Applicant Response

May 2023

Project:	AINA3004 – Upper Wellington	Description of Development:	‘Outline Planning permission for approximately 320 residential (Use Class C3), a primary school, a local centre comprising community facilities (Use Class F2) and a rural enterprise hub (Use Classes E) together with a mobility hub, open space, drainage and supporting infrastructure. New vehicular and pedestrian access off Long Marston Road with all other matters reserved.’
Local Planning Authority:	Buckinghamshire Council (Aylesbury Vale area)		
Planning Reference:	22/02189/AOP		
Validation Date:	24/05/2022		
Consultation Dates:	28 June – 26 July 2022		
Target Determination Date:	Withdrawn Oct 2022		

Introduction

The table below sets out a summary of the statutory consultee responses that were provided during the determination period of the earlier application relating to the same development proposals. All comments have been taken into consideration and have informed the assessments that support the re-submission application. The table includes a summary of how the applicant has addressed these comments and identifies within the re-submission documentation where further detail can be found.

Consultee	Date	Summary of Comments	Applicant Response
Natural Environment			
Natural England	29 June 2022	<p>Objection – Further Information Required</p> <ul style="list-style-type: none"> A Habitats Regulations Assessment is required to determine the Likely Significant Effect on Chiltern Beechwoods SAC. Mitigation measures will be necessary to rule out adverse effects on integrity. NE recognises that new housing within 12.6km of Ashridge Commons and Woods SSSI can be expected to result in an increase in recreation pressure. NE are working with involved parties to achieve a Strategic Solution which is likely to require all new dwellings within 12.6km to pay financial contributions. In the interim NE are looking for bespoke mitigation. In combination with other plans/projects the development would be likely to contribute to the deterioration of the quality of the habitat by reason of increased access for recreation and dog-walking. There being alternative solutions to the proposal and no imperative reasons of overriding public interest to allow the proposal, despite a negative assessment, the proposal will not pass the tests of Regulation 62. An appeal decision dated 1 March 2022 is attached. The proposed development is located within a proposed area of search which NE is considering as a possible boundary variation to the Chilterns AONB. Although the 	<p>➤ Please refer to the enclosed shadow Habitat Regulations Assessment; Landscape Visual Appraisal and the Landscape Strategy (Drawing No. edp6433_d012h)</p> <p>➤ In accordance with this comment the submitted shadow HRA details the mitigation measures (which include the SAMM contributions and the provision of offsite SANG) to ensure that no detrimental harm is caused to the Chiltern Beechwood SAC.</p> <p>➤ The shadow HRA forms the starting point for further discussion with Natural England and the Competent Authority to secure the SAMM and SANG provision (including a Management Plan) via a S.106 agreement.</p>

assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal.

28th
September
2022

- Natural England notes that the LPA has undertaken an appropriate assessment of the proposal. The appropriate assessment concludes that the LPA is not able to ascertain that the proposal will not result in adverse effects on the integrity of any of the European sites in question.
- Natural England concurs that it is not possible to ascertain that the proposal will not result in adverse effects on site integrity, as the mitigation strategy for the Chilterns Beechwoods SAC has yet to be finalised and agreed. The proposal does not currently provide enough information and/or certainty to enable adverse effects on site integrity to be ruled out.

Local Lead Flood
Authority

19 July 2022

Objection - insufficient information of the proposed surface water drainage.

- The FRA refers to the presence of a culverted watercourse as a surface water sewer. LLFA believes this is incorrect and request that the FRA is amended to provide details of the location of the watercourse, proposed point of connection, CCTV survey and evidence of downstream connectivity in form of walkover survey and photos.
- The LLFA are concerned that the proposed Attenuation Basin E is located in an area at high risk of surface water

➤ **These comments have been addressed in the amended Flood Risk Assessment and the enclosed Drainage Strategy.**

- A site visit was undertaken on 24th November 2022 to confirm if an open watercourse does exist as illustrated on Buckinghamshire Council's Asset Register. A walk along Church Farm Lane and across the public footpath did not identify any open watercourse.
- The Illustrative Layout identifies an open linear water feature in the NE area of the site where the culvert exists. The FRA

flooding which means there may be reduced capacity to accommodate surface water runoff. This would not be acceptable. The applicant is required to relocate the attenuation pond to demonstrate that flood risk will not be increased as a result of the development.

- A 'cut off' ditch is referred to in the FRA but not included on the drainage scheme. More information should be provided and the drainage layout updated.
- The LLFA request that the applicant investigates the inclusion of additional SuDS components such as rain gardens and rain planters and active rainwater harvesting. The proposed permeability of hardstanding areas is unclear. Could also investigate creation of a reed bed in attenuation basins for biodiversity. Swales have been considered but not included in the drainage layout or calculations. This should be included if they are necessary to reduce flood risk.
- Error on key labelling on drainage layout should be revised (foul pipes).
- The applicant will be required to provide a water quality assessment reflective of the SuDS components proposed.
- The following information is required to support the application at this stage of the planning process:
 - Details of the location of the watercourse (referred to a surface water sewer), proposed point of connection and evidence of the downstream connectivity in the form of

confirms that the creation of an open water feature (from the currently culverted watercourse) overcomes the risk of surface water flooding by providing a destination for the surface water to flow into. Creating an open watercourse will also allow for a greater volume of surface water to flow through the site compared to the existing pipe, again reducing any surface water ponding in that location. Furthermore, no development is proposed to the east of the watercourse, meaning the design of the watercourse can ensure that any surface water flow greater than the volume of the channel overflows into the eastern open space instead of Basin E. This can be achieved by lowering the eastern bank of the watercourse.

- The proposals have incorporated additional SuDS components which comprise a network of swales and drainage ponds (which will remain wet in part to enhance wildlife and amenity) including the opening up of an existing culvert within the eastern section of the site into an open swale. Permeable paving, tree outs, rain gardens and active rainwater harvesting will be considered at detailed design. Please refer to the illustrative layout for further detail.

a walkover survey with supporting photographic evidence.

- Relocation of attenuation basin E to demonstrate that flood risk will not be increased as a result of the proposed development in accordance with paragraph 167 of the NPPF, 2021.
 - Further information regarding the “cut-off ditch” including the proposed size, location, and outfall location and rate.
 - Investigation into de-culverting the ordinary watercourse in line with Policy NE2 of the Vale of Aylesbury Local Plan which states that “opportunities for de-culverting of watercourses should be actively pursued”.
 - Existing run off rates (brownfield rates) must be calculated using the modified rationale method and supporting calculations must be provided.
 - Calculations must be submitted for the 3.3% AEP with an allowance for climate change.
 - An urban creep value of 10% should be applied to calculations
 - An investigation into the use of additional above ground SuDS such as permeable paving, tree pits and rain gardens
- A walkover survey was carried out – See above.
 - The relocation of Basin E is not necessary – See above.
 - The updated application includes the de-culverting of the watercourse. This comprises c.127m of an open channel with a bank width of 3.5m with a bed width of 0.5m and a depth of 0.5m. This will allow for 1 in 3 slopes for the banks. There is sufficient space at this location for a wider channel for 1 in 4 slopes, which would provide an overall bank width of 4.5m. The detailed design of this channel will be submitted for approval at reserved matters stage.
 - Brownfield rates have been calculated and reported upon within the FRA.
 - Calculations include 3.3%AEP + Climate change and 10% Urban Creep.
 - Table 8-2 within the FRA identifies SuDs measures which should be considered at detailed design. This includes pervious pavements, trees and rainwater harvesting systems.
 - Swales have been considered at outline stage.

-
- Confirmation of the use of swales
 - Updated drainage layout in line with any revisions made to the scheme, and to address the incorrect labelling of the pipes,

23
September
2022

Objection - insufficient information regarding the proposed surface water drainage scheme.

The information below is required:

- Walkover survey demonstrating the point of entrance and exit of the culvert/pipe onsite, and evidence of the downstream connectivity clearly shown on a map with supporting photographic evidence.
- Should the presence of the culvert be confirmed, the applicant should investigate de-culverting the ordinary watercourse.
- Relocation of Attenuation Basin E to an area wholly outside of surface water flood risk.
- Existing runoff rates (brownfield rates) must be calculated using the modified rationale method and supporting calculations provided.
- Investigation into the inclusion of permeable paving at this stage of the planning process to account for the increased storage volume.

- An updated drainage layout in accordance with revisions made to the scheme.

Ecology	8 July 2022	Objection – further information is required.	➤ Please refer to the enclosed shadow Habitat Regulation Assessment; Ecological Impact Assessment and the Landscape Visual Assessment.
		<ul style="list-style-type: none"> • Reptile and barn owl surveys undertaken in 2022 are required. 	➤ Following the initial submission reptile, barn owl and badger surveys were issued to Buckinghamshire Council 1 st September 2022 and are incorporated into the amended Ecological Impact Assessment.
		<ul style="list-style-type: none"> • The site lies within 12.6km of Chiltern Beechwood SAC, and is located approximately 5.5km from Ashridge Commons and Woods SSSI and 4.5km from Tring Woodlands SSSI. As a result of the increase in homes the SAC might be subject to additional recreational pressures which may cause harm to the integrity of the SAC. 	➤ Please see comments to Natural England above.
		<ul style="list-style-type: none"> • Buckinghamshire Council must undertake a HRA, and the applicant must provide a HRA to demonstrate that the development would have no impact on the SAC or that any impacts can be appropriately mitigated. 	
Contamination and Pollution			
Environmental Health (Noise)	19 July 2022	Comments / Recommendations	➤ Please refer to the enclosed Noise Impact Assessment.
		<ul style="list-style-type: none"> • Noise Assessment has omitted any real comment on the likely impact of operations associated with the adjacent airfield which is understood to be in active, albeit limited use for recreational aviation. Unattended noise monitoring is unlikely to gather acoustic data on take-offs and landings due to the sporadic nature usually at 	➤ A weekend monitoring was undertaken on 5 th & 6 th August to capture the continuous sound measurements during the weekend period and when recreational aviation activities associated with the adjacent airfield which are understood to be more frequent.

weekends. Given the orientation of the runway and typical prevailing wind direction it is likely that these aircraft will fly over a low altitude over the majority of the site. These episodes should be assessed.

- Recommends that the application is not determined until a revised noise impact assessment has been received and reviewed.
- Aside from airfield noise, agree that the site is broadly capable of residential development subject to noise control measures dealt with at reserved matters.
- Recommend the LPA consults with the airspace/airfield operations regulator as regards the safety issues associated with low level flying over housing.

- We anticipate construction and environmental management conditions to be applied and welcome engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being a cross boundary application.

Transport

Public Rights of Way

19 July 2022

Comment / Recommendation

- Existing footpath MAR/17/1 connects the site to Church Farm Lane. The footpath is a dead-end and access is restricted by a barbed wire fence. This is not unusual for footpaths to former WW2 military airfields because many were not reinstated post-decommissioning. The illustrative masterplan indicates a connection can be made across the existing boundary to footpath MAR/17/1.
- Assuming Footpath MAR/17/1 is made fully accessible, the route does not seem to provide a particularly shorter

- **Please refer to the revised Illustrative Layout (Ref. 3007 Rev. F)**
- The revised illustrative layout maintains connections to these footpaths.

		<p>walk into Marsworth for pedestrians than the proposed footway via Long Marston Road. However, being off-road it would be more attractive in daylight and good weather conditions, especially for residents in the eastern sector of the site. Nevertheless, PROW would not consider it necessary for surface improvements.</p> <ul style="list-style-type: none"> • Recommends that any requirement for stock control on neighbouring land would need permission for a new gate and an informative is recommended. The barbed wire fence is an enforcement matter for the council to address. Surface improvements are not considered necessary. 	<ul style="list-style-type: none"> ➤ The details requirement for stock control are noted.
Highways (Buckinghamshire County Council)	26 August 2023	<p>Objection – more information is required.</p> <ul style="list-style-type: none"> • Broadly agree with the applicant that weekday AM and PM peaks will have the biggest impact on the highway network. • Whilst it is acknowledged that a full turning count survey was undertaken in June 2021, within a neutral period of school terms and outside of periods of Covid National Lockdown restrictions, surveys should have been carried out for more than one day. Further explanation is required and evidence as to the robustness of the survey data on which traffic assessment is based. 	<ul style="list-style-type: none"> ➤ Please see submitted Transport Assessment (TA) ➤ To supplement the TA a Stage 1 Road Safety Audit of the proposed offsite highway works was undertaken and is enclosed.

-
- Clarification required as to why the traffic surveys in the Appendix are from 2021 and why the growth factor have been taken from 2019
 - Would like the Applicant to show the trip rates for non-residential uses during the peak hours and to factor these rates into the junction capacity assessment. Clarification required on whether the applicant has taken into account the traffic associated with the existing permitted uses in their traffic assessment.
 - The reduction of the speed limit along Long Marston Road / Lukes Lane from 60mph to 30mph would be subject to statutory public consultation, and Thames Valley Police and Buckinghamshire Council's Network Safety Team would need to provide a view and be supportive of speed limit changes ahead of the statutory public consultation. The priority narrowing would not be supported and if the road speed were to be reduced to 30mph, the Police would expect a package of significant traffic-calming measures to be introduced and would require a road speed assessment to be undertaken
 - Consider that to the west a visibility of only 2.4m x 114m can be achieved and to the east a visibility of 2.4m x 125m can be achieved onto Long Marston Road.
 - Require a speed survey to be undertaken to determine the speed vehicles currently travel along Long Marston
- The TA has been updated to the address the comments raised. The revised report includes the analysis from 7 day traffic counts which took place in October 2022 to record existing speeds and number of movements. Section 7 of the TA includes an assessment of the proposed employment using the TRICS database.
 - Visibility splays are shown on the enclosed Site Access Plan (Ref. 2497-F04 Rev. B)
 - As above, the revised TA report includes the analyses from 7 day traffic counts which took place in October 2022 to record existing speeds and number of movements.

-
- Would like the applicant to submit a further plan demonstrating that all the highway works are achievable within the public highway or within the red edge of the site.
 - Have concerns that the level of forwards visibility along Long Marston Road is still not acceptable and that the carriageway is not wide enough in some locations to adequately support two-way flow.
 - Welcome the implementation of this bus diversion however concerns were raised over how useable this bus service will be for residents.
 - The implementation of a large amount of street lighting is likely to be problematic from a planning perspective.
 - The proposed footway is 1.5m wide for most of its duration which is too narrow and does not meet the minimum requirement in the Department for Transport's (DfT) Inclusive Mobility document of 2m.
 - With regards to the 1m wide coloured section of carriageway along Red Lion Bridge to provide a degree of pedestrian provision the length of a restricted section of footway / pedestrian area should only be for 6m according to DfT's Inclusive Mobility document and this restricted pedestrian area is for a distance of approximately 37m.
 - The rural footway adjacent to Long Marston Road is not considered to be a safe and suitable route to cater for
 - To ensure the proposals adequately accommodate footways between the application site and the surrounding area the proposals include:
 - Highway improvements within the public highway which include the connection to and widening of existing footways along Long Marston Road along with the widening of the carriageway.
 - The provision of pedestrian improvements to the Canal bridge along Vicarage Road are proposed via a signalised junction and 1m coloured surface for pedestrians
 - A new section of footpath and improvement works to the existing pedestrian infrastructure on Long Marston Road and
-

pedestrian movements to and from the site do not consider that this route into Marsworth would be attractive for pedestrians, and they would look to use alternative transport options.

Vicarage Road to facilitate safe movement to Marsworth Village and other neighbouring communities.

Heritage

Archaeology

4 July 2022

No Objection subject to Conditions

- The ground works may impact buried archaeological assets from the wartime airfield and earlier phases of activity recorded in the vicinity. If planning permission is granted for this development it is likely to harm a heritage asset's significance so a condition should be applied to require the developer to secure appropriate investigation, recording, publication and archiving of the results.

- **Please see submitted Archaeological Impact Assessment.**
- It is anticipated that archaeological conditions will be attached to any permission and we welcome engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being a cross boundary application.

Heritage

4 July 2022

No Objection subject to Condition

- The proposed application would remove non designated heritage assets relating to World War II. Agree with the Heritage Statement that the two Romney hits are NDHAs but represent comparatively poor examples of their type and do not hold sufficient heritage interest to warrant their ongoing retention. The application would not raise any heritage objection subject to a condition being applied to the whole site to require the developer to secure appropriate investigation, recording, publication and archiving of the results.

- **Please see submitted Heritage Assessment.**
- We welcome engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being a cross boundary application.

Health and Wellbeing			
Hertfordshire and West Essex Integrated Care Board	19 July 2022	<p>No objection subject to certainty that developer's contributions will be secured or that healthcare forms part of the development.</p> <ul style="list-style-type: none"> Based on average occupancy of 2.4 occupants per dwelling this development will create circa 768 new patient registrations (more if 3+ bedroom homes). A S106 contribution is requested of £1,292 per dwelling = <u>£413,440</u> total. It is proposed to focus contributions on the Alpha Primary Care Network (PCN) which had 7 premises, and may be used for expansion, reconfiguration, digitisation of records to increase clinical space. Trigger points on occupancy of the 80th, 160th and 240th dwellings are requested. 	<ul style="list-style-type: none"> ➤ Please see Planning Statement. ➤ These financial contributions and trigger points are acknowledged and will inform section 106 discussions with the Local Planning Authorities.
Parks and Recreation	26 August 2022	<p>Objection – the application is currently unacceptable in its current form.</p> <ul style="list-style-type: none"> This application is currently unacceptable as it fails to demonstrate that minimum areas for Major Open Space (MOS), Incidental Open Space (IOS), Equipped Designated Play Areas (EDPA), and Multi Use Games Area (MUGA) can be satisfactorily accommodated on site and including minimum buffer distances. 	<ul style="list-style-type: none"> ➤ Please see submitted Illustrative Layout (Ref. 3007 Rev. F). ➤ This has been taken into consideration and the revised illustrative Layout (Ref. 3007 Rev. F) now identifies 0.96ha of Major Open Space, 1.12ha of incidental open space, an equipped play area and 0.1ha MUGA area (0.1ha in size). ➤ The MUGA (+30m buffer) is within the expansion area and is to be allocated for the Primary School which will be accessible to the local community outside of school hours.

-
- No Local Areas for Play (LAPs) should be included in any development due to the limited age range and play value these areas provide. LAP's should be included within Local Equipped Areas for Play (LEAPs) that are designed for 2 to 12 year olds.
 - A bond, estimated around £560,000 per ha, will be required to ensure the delivery of the open space scheme, and a commuted sum (currently £58,800 per ha) and additional commuted sum will be required towards the open space's future maintenance, should the open space be transferred to the Parish Council.
 - The standards for play areas are outlined to ensure that they are of sufficient quality, accessibility and safety. Developers should obtain written confirmation of compliance from the supplier.
 - Developers should ensure that designs and the actual built play spaces achieve a minimum rating of 'Good' against all criteria measured in RoSPA's 'Play Value Assessment'.
 - The play area(s) should be integral to the housing development. Easy walking routes for a child living within the housing development and with no intervening major roads on route should be provided.
 - All access points and pathways should be DDA compliant.
- The revised accommodates 0.08ha LEAP (+20m buffer) within the northern area. A 2.5km walk route that interlinks throughout the site and there are a number of locations where outdoor gym equipment could be located alongside natural play for older children.
 - The Fields Trust Guidance has been a material consideration that has informed the Illustrative Layout and POS provision.
 - The financial contributions are acknowledged and will inform section 106 discussions with the Local Planning Authorities.
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		<ul style="list-style-type: none"> • Further guidance in relation access, pathways, surfacing, planting and play equipment is provided 	
Buckinghamshire Council - Education	3 August 2022	<p>Comment</p> <ul style="list-style-type: none"> • Secondary and special schools in the area are at capacity, with the estimated pupil growth from planned housing growth projected to put significant increased pressure on schools. A financial contribution is therefore required. • Primary schools in the area are also close to capacity so a new 0.5FW school would ensure children on the development could be accommodated. 0.5FE is lower than the DfE's preferred size of school so flexibility is required to explore alternative options to ensure the most financially viable solution. • Education contribution costs for dwelling sizes are provided. 	<ul style="list-style-type: none"> ➤ Please see submitted Planning Statement. ➤ Initial calculations on the likely financial contributions towards secondary school provision is noted and understood. We welcome engagement with both LPAs and LEAs in relation to proportionate planning obligations. ➤ Following the positive engagement with Buckinghamshire Education Authority, the proposals include a 0.5 Form Entry primary school with playing field and a 0.5ha Multi Use Games Area. The potential for the school to expand to 1 Form Entry has been accounted for to accommodate future growth. We have sought to further engage with the Local Education Authority with regard to the provision of a MUGA within the grounds of the school expansion area as an efficient and cost-effective way to provide this facility for the benefit of the pupils and the community. ➤ We welcome liaison with the LEA during S106 discussions, particularly in relation to the transfer of the land to facilitate future expansion of the school and to ensure contributions to the delivery of the onsite school is proportionate to the pupil yield arising to the development.

Thames Valley Police	19 July 2022	<p>No objection.</p> <ul style="list-style-type: none"> • Comments provided to aid subsequent submissions in relation to design and layout of: <ul style="list-style-type: none"> – Footpaths and cycle paths – Grid layout – Rear garden access – Communal dwellings – Play parks – Lighting – Parking – Active Surveillance – Schools 	<ul style="list-style-type: none"> ➤ Please refer to the revised Design and Access Statement and illustrative layout (Ref. 3007 Rev. F) for further detail and amendments to the design and layout of the scheme.
Landscape and Urban Design	26 August 2022	<p>Comments</p> <ul style="list-style-type: none"> • Broadly agree with the LVIA conclusion that mostly moderate adverse landscape character effects are at construction and year 1. Don't agree with conclusion that these reduce to moderate/minor effects at year 15. 	<ul style="list-style-type: none"> ➤ Please refer to the revised Illustrative Layout (Ref. 3007 Rev. F); Landscape Visual Assessment (LVA) and the Design and Access Statement (DAS). ➤ The LVA has been updated to address these points and includes consideration of landscape impacts taking into account the proposals including offsite highway improvements. ➤ The Photomontages have been updated to that take into account the likely materiality of the proposed scheme.

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- While there are existing buildings on the site in some of the photomontage views, the density of development is considerably less than proposed. Do not agree with the analysis of the visual impacts upon view EDP 7.
 - While there is no modelling of potential lighting effects, it is noted that the site occupies a principally dark part of the landscape. If lighting provided offsite for new footpaths this would have adverse local visual effects during the day (lighting columns in countryside) and more extensively at night.
 - A1 photomontages don't enable satisfactory viewing at appropriate scale.

Site Layout and Design comments

- The perimeter blocks are satisfactory in principle though somewhat urban in character and a more fluid arrangement of blocks would be preferable.
- The substantial landscape buffer/POS to the margins is welcomed.
- Location of local centre, enterprise zone, and school are questioned. A position close to the public road would be more viable/accessible.

Design and Access Statement comments

- The illustrative layout has now been updated and positions the local centre and rural enterprise hub at the proposed point of site access.

- These points have all been considered and responded to accordingly within the DAS. An assessment of nearby villages is

- Difficult to see new village character in the current proposals and the masterplan shows a standard suburban layout. It is an estate not a village.
- Principles of a 20minute neighbourhood are proposed but the scale of development is unlikely to be sufficient to support all associated principles (e.g. health and wellbeing, school, local food production, bus services).
- Site is poorly connected with other villages/neighbourhoods.
- Proposed road widening, lighting etc. will cause significant harm to the established rural character of the lanes.
- No discernible response to landscape in building heights and massing.
- Suggest the retention of the blast centres is related to the cost of demolition rather than any significant merits from a heritage perspective.
- 3 story homes are likely to increase the perception of scale and massing and increase adverse landscape and visual impacts and should be avoided.

Overall the proposed development is inappropriate in this location. It does not reflect the pattern and character of local villages and does not integrate well with the surrounding landscape.

incorporated within the DAS and informs the proposed layout/form of the illustrative layout.

- Detailed consideration has been given to the proposed offsite highway improvement works to ensure the site is connected to nearby villages by bus, cycle and on foot. The LVA includes an assessment of the proposals in conjunction with the offsite highway works. This includes a highway landscape strategy to demonstrate where new planting can be located along the highway (within highway controlled land) to mitigate the loss arising from the improvement works. On balance, the benefits associated with the proposed improvement works (providing existing residents with improved access to community facilities) are greater than the adverse impacts to the rural character of the lane.
- We note that no objection was raised in relation to the demolition of existing buildings by the Conservation and County Archaeologist.
- The provision of up to 3 storeys within the central area of the proposed development is an appropriate response to the principles of making efficient use of land and creating a sense of place. These maximum building parameters have been taken into consideration and assessed with the LVA.

Town/Parish Council				
Ivinghoe Parish Council	5 July 2022	No Comment		➤ N/A
Councillor Chris Poll	18 July 2022	Comment Wish to call in this application to be considered at planning committee should the officer be minded to approve. Key issues: <ul style="list-style-type: none"> • The proposed location is not sustainable and will put pressure on local roads. There are no footpaths beyond the application site and the road is unsuitable for extra traffic. • Local amenities and services are oversubscribed. • Not brownfield site 		➤ Please refer to the amended DAS and the illustrative Layout (Ref. 3007 Rev. F). ➤ The proposals seek to reduce trip generation and private car usage. A Framework Travel Plan has been prepared and is enclosed within the Transport Assessment. ➤ The scheme has appropriately accommodated open space; several community facilities onsite (including a school and community shops, business hub) and financial contributions will be made towards secondary school provision and for the expansion/reconfiguration and possible relocation of existing GP facilities. ➤ Under the National Planning Policy Framework the land constitutes previously developed land. The Sites brownfield status was agreed with the LPA during the determination period of the original application.

		<ul style="list-style-type: none"> Current activities on site may not have been regularised (under investigation) 	<ul style="list-style-type: none"> The current activities which we understand may be a subject of enforcement investigation are separate to consideration of this planning application and are inconsequential to the proposals.
Cheddington Parish Council	20 July 2022	Objection <ul style="list-style-type: none"> The development will have major repercussions on current infrastructure and facilities with regard to local health services and education. Traffic increase and safety is an issue. 	<ul style="list-style-type: none"> Please refer to submitted Planning Statement.
Marsworth Parish Council	17 August 2022	Objection Key issues raised include: <ul style="list-style-type: none"> The site was considered unsuitable in Aylesbury plan The remote site will cause traffic issues and the surrounding road infrastructure is inappropriate Lack of pedestrian access/safety Distance from facilities Previous schemes have proposed mixed uses but these haven't materialised 	<ul style="list-style-type: none"> Please refer to the submitted shadow HRA; Utility Feasibility Report; Flood Risk Assessment; Transport Assessment and Framework Travel Plan. A number of these comments have been satisfied within the updated re-submission documents. For example, a shadow HRA has been submitted to address Chiltern Beech SAC impacts, both LPAs have confirmed through previous correspondence that the site by definition is brownfield. The application is supported by a utility feasibility study which takes into account the underground pipeline and water supply. The flood risk assessment identifies an appropriate foul water drainage strategy. The proposals are supported with a mobility hub, extended bus services (which provides a half-hourly service during weekdays and significant improvements to pedestrian connectivity and safety between the site and adjoining villages.

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- There are no mitigation measures to protect Chiltern Beechwoods SAC
 - Tring secondary school would not be big enough for amount of development in the area
 - Two previous refusals and enforcements at the site. The site has been subject to continuous violation of planning regulations.
 - The majority of the site is not brownfield and refers to its history as agricultural land.
 - Refer to the lack of capacity in sewage system and water supply.
 - The underground oil pipeline.
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AINA3004 Upper Wellington – Dacorum Council Statutory Consultee Comment Tracker and Applicant Response

Updated May 2023

Project:	AINA3004 – Upper Wellington	Description of Development:	'Outline Planning permission for approximately 320 residential (Use Class C3), a primary school, a local centre comprising community facilities (Use Class F2) and a rural enterprise hub (Use Classes E) together with a mobility hub, open space, drainage and supporting infrastructure. New vehicular and pedestrian access off Long Marston Road with all other matters reserved.'
Local Planning Authority:	Dacorum Council		
Planning Reference:	22/01678/MOA		
Validation Date:	24/05/2022		
Consultation Dates:	28 June – 26 July 2022		
Target Determination Date:	Withdrawn		

Introduction

The table below sets out a summary of the statutory consultee responses that were provided during the determination period of the earlier application relating to the same development proposals. All comments have been taken into consideration and have informed the assessments that support the re-submission application. The table includes a summary of how the applicant has addressed these comments and identifies within the re-submission documentation where further detail can be found.

Consultee	Date	Summary of Comments	Applicant Response
Natural Environment			
Natural England	14 June 2022	<p>Objection</p> <ul style="list-style-type: none"> Developments between 500metres to 12.6km from Chiltern Beechwoods SAC require a Habitat Regulations Assessment to determine the likely significant effect. Mitigation measures will be necessary to rule out adverse effects on integrity. 	<ul style="list-style-type: none"> ➤ Please see submitted shadow Habitat Regulations Assessment (HRA) ➤ In accordance with this comment the submitted shadow HRA details the mitigation measures (which include the SAMM contributions and the provision of a SANG) to ensure that no detrimental harm is caused to the Chiltern Beechwood SAC. ➤ The shadow HRA forms the starting point for further discussion with Natural England and the Competent Authority to secure the SAMM and SANG provision including a Management Plan for the SANG which will be secured via S.106 agreement.
Lead Local Flood Authority	3 November 2022	<p>Objection – additional information required.</p> <p>The following information is required:</p> <ul style="list-style-type: none"> The future detailed design should ensure the pumping station is located away from the area at surface water risk. Surface water risk recorded within the east of the site should be accounted for when deciding the location of such a structure. 	<ul style="list-style-type: none"> ➤ Please refer to the enclosed Flood Risk Assessment and Drainage Strategy. ➤ The FRA confirms that the creation of an open water feature (from the currently culverted watercourse) overcomes the surface water risk by providing a destination for the surface water to flow into. Creating an open watercourse will also allow for a greater volume of surface water to flow through the

- It is acknowledged that the surface water storage volumes and flows from each catchment were calculated however clarification is required on whether the proposed volume calculations include for climate change allowances as indicated in the report.
 - Written confirmation from Thames Water that they have capacity to take the proposed volumes and runoff rates.
 - It is advised that a Topographical Survey to mAOD should be undertaken at that stage of development to fully inform the flood risk assessment and take account of associated flood risks from surface water sources.
- site compared to the existing pipe, again reducing any surface water ponding in that location.
 - The applicant has provided calculations for the 1 in 10 year plus 35% climate change allowance which demonstrates that the system does not flood.
 - It is understood that Thames Water are a consultee that were notified of the application when it was submitted. No comment was made. Detailed liaison with utility providers, particularly in relation to capacity and potential requirement for reinforcements, typically takes place at detailed design stage.
 - The proposals are informed by a topographical survey of the site.

Contamination and Pollution

Environmental
and Community
Protection

15 June
2022

Comment / Recommended Conditions

- The noise impact assessment is sound, subject to planning conditions to secure mitigation for the high-risk areas and a scheme for achieving the noise levels outlined within the report is submitted and approved.
 - EV charging points are greatly encouraged – if not the points themselves then the infrastructure required on each property.
 - Prior to commencement, conditions are suggested relating to:
- **Please see submitted Noise Impact Assessment.**
 - The Noise Assessment concludes that mitigation measures will be secured to minimise amenity impacts to sensitive receptors (i.e. nearby residents along Lukes Lane) during construction.
 - In accordance with these comments as part of the Framework Travel Plan (included within Appendix 6 of the Transport Assessment) each home with a garage or driveway, benefits from an electric car charging point.
 - We anticipate construction and environmental management conditions to be applied and welcome

- A Demolition and Construction Management Plan should be submitted and approved in writing by the LPA. The approved statement should be adhered to throughout the construction period and the approved measures shall be retained for the duration of the demolition and construction works.
- Further to the receipt of the noise assessment, mitigation for high-risk areas outlined need to be proposed. As such prior to the commencement of development a scheme for achieving the noise levels outlined in Report No. J10-12006A-20A/1/F2 with regards to the residential units shall be submitted and approved in writing by the Local Planning Authority. Once approved the scheme shall be implemented before first occupation of the residential units and therefore maintained in the approved state at all times. No alterations shall be made to the approved structure including roof, doors, windows and external facades, layout of the units or noise barriers.

engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being a cross boundary application.

Contamination	15 June 2022	Comment / Recommendations <ul style="list-style-type: none"> • The historical and current land uses are such that ground contamination is likely, which combined with the proposed land use's vulnerability to the presence of contamination requires conditions including: <ul style="list-style-type: none"> – The submission of an intrusive site investigation report; a Remediation Method Statement report. 	<ul style="list-style-type: none"> ➤ Please see submitted Phase 1 Geo-environmental Assessment. ➤ The Phase 1 Geo-environmental Site Assessment identifies the potential contamination sources onsite due to its previous use. The Report has recommended further surveys are undertaken. The proposed development will be carried out in accordance with this guidance. ➤ The proposals are considered to be of significant environmental benefit as it will ensure appropriate
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- If contamination is encountered during the development of the site it shall be brought to the attention of the LPA.
 - remediation of existing sources of contaminant onsite.
 - We anticipate contamination conditions to be applied and welcome engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being a cross boundary application.

- The following observations were made regarding the Preliminary Risk Assessment and should be addressed:
 - The conceptual site model includes a PL for the possible presence of energetic compounds;
 - Consideration is given to the potential benefits of a GPR survey
 - Reference is made to the knowledge/status of current and/or historic surface water drainage features across the site, with surveys where relevant.

Education

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|-----------------------------|---------------|---|---|
| Spatial Planning Unit (HCC) | 1 August 2022 | <ul style="list-style-type: none"> • Acknowledges the sites location within the borough council's CIL zone 2 charging area. To mitigate the impact of the development on secondary school places in the area S106 financial contributions are required. The demographic of future occupiers has been modelled and suggests a peak pupil yield of 97 primary school and 70 secondary school pupils. | <ul style="list-style-type: none"> ➤ Initial calculations on the likely financial contributions towards secondary school provision is noted and understood. We welcome engagement with both LPAs and LEAs in relation to proportionate planning obligations. |
|-----------------------------|---------------|---|---|

- Identifies that at 320 dwellings, the peak pupil yield arising from this scheme is approximately 0.46 forms of entry (0.46FE) which equates to approximately 97 primary school pupils and approximately 70 secondary school pupils.
- HCC wishes to seek additional secondary education contributions towards the expansion of Tring Secondary School. The modelling calculates the contribution of £1,913,341. However as only 19% of the site falls within Hertfordshire the contribution has been reduced to £363,341.79. This approach has been provisionally agreed with Buckinghamshire Council.

Transport

Hertfordshire
County Council –
Highways
Authority

6 June 2022 **Objection /Recommended for refusal**

The key issues identified include:

- A speed survey is required before the reduction in speed can be considered.
- Proposed highway works would result in the loss of significant amounts of verge and existing vegetation and has not been shown with appropriate verges. Lighting is also proposed.

- **Please see submitted Transport Assessment; Arboricultural Impact Assessment; Design and Access Statement (DAS) Indicative Highway Landscape Strategy (Ref. edp6433_d014a) and Site Access Plan (Ref. 2497-F04 Rev. B).**
- Since the applications original submission, a 7 day traffic count took place in October 2022 to record the existing speeds and number of movements. This has been incorporated into the capacity assessment and has informed the proposed highway improvements works set out within the enclosed Transport Assessment.
- An Arboricultural Impact Assessment for the highway works has been undertaken to understand the extent of vegetation removal that is required to accommodate the improvement works. Moreover, the offsite highway

- Concerns were raised with regards to the road widening and its impact on the rural nature of Luke's Lane/Long Marston Road.
 - No footway is proposed to the west of the site access, and no footway or cycle facilities are proposed to Marsworth.
- improvement works (contained within the Transport Assessment) have been revised and adjusted to minimise tree removal.
 - An indicative Highway Landscape Strategy (Ref. edp6433_d014a) has been prepared by EDP, in consultation with Eddisons (highways consultant) to identify areas within the verge where planting can be appropriately located to mitigate the loss. This, in conjunction with the significant opportunities within the development site itself for tree and hedgerow planting will mitigate the loss of sections of vegetation along the highway verge. On balance, the improvements will not unacceptably alter the rural character of the road and will be of benefit to ensure safe pedestrian access for the local community in nearby villages to walk to the facilities proposed as part of the development.
 - A new section of footpath along with improvement works to the existing pedestrian infrastructure on Long Marston Road and Vicarage Road to facilitate safe movement to Marsworth Village and other neighbouring communities. Please refer to the revised Illustrative Layout (Ref. 3007 Rev. F); the DAS and the Highway Improvement Works for further detail.

- The proposed give way outside 7 and 8 Long Marston Road is unacceptable given the scale of the development. Space for a two-way carriageway must be ensured.
 - Visibility splays are requested.
 - Road Safety Audit (RSA) is requested.
 - No bus service is proposed on the weekends. The bus route is dependent on road widening and the reduction in speed. Proposed weekday hourly service is not deemed as frequent and will not result in a real alternative to the private car.
 - The principle of the Mobility Hub is welcomed however, limited details are provided.
- Priority give way arrangements are a common feature on major and minor residential access roads that is an established measure contained within guidance documents such as MfS and LT 1/01 Traffic Calming
 - Visibility splays are shown on the enclosed Site Access Plan (Ref. 2497-F04 Rev. B)
 - An Independent Stage 1 Road Safety Audit has been commissioned and is enclosed within the Transport Assessment. This has informed the updated access arrangements.
 - Following discussions with the Bus Operators, services have been amended and will run:
 - Monday-Friday; every 30 minutes between the hours 08:00-18:00. This has increased from an hourly service that was previously proposed.
 - Saturday; every hour between the hours 08:00-17:00.
 - Due consideration has been given to how the Mobility Hub might operate informed by liaison with the bus and car club operators.

- Given the limited cycling facilities within the vicinity of the site encouraging large amounts of e-bike use is not deemed appropriate.
 - No shops or local services are within walking distance. There are limited amenities in Marsworth and are over 1.2km away. An onsite community shop and café/local businesses. will not reduce demand to travel to larger shops and secondary schools.
 - Further information on the trip rates associated with non-residential use classes is required before the final trip rates can be agreed.
 - The turning count surveys are welcomed, however the Tring Road/Astrove Lane/Station Road crossroads should also be assessed and junctions modelled.
- The Transport Assessment is informed by Strava data which indicates a high frequency of cycle activity. As such, the provision of e-bikes (or a similar scheme such as Brompton hire) at this location is acceptable.
 - The Scheme has appropriately accommodated several community facilities on the site which include; a community convenience store (approx. 190sqm), a multi-use community and meeting space (approx. 240sqm) and café, services, business space (approx. 180sqm). Please refer to the Planning Statement for further detail. As with any of the existing villages in the locality, commuting for larger shopping trips and trips secondary school will be necessary. The extended bus service, alongside other features of the Mobility Hub are provided to reduce reliance on the car for such journeys.
 - The enclosed TA been updated to the address the comments raised. The revised report includes the analyses from 7 day traffic counts which took place in October 2022 to record existing speeds and number of movements.
 - These junctions have been assessed. Please refer to Appendix 17 of the Transport Assessment for further detail.

- The surveys were only undertaken on 1 day. Given the scale of development best practice requires a week-long ATC survey to be undertaken.
 - No TRICS assessment for the non-residential uses on the site has been undertaken. Further justification is required for the TA comment that it is anticipated that all non-residential trips will be internal.
 - The significant increase in vehicle traffic on the 10 tonne limited bridge on Tring Road would not be appropriate.
 - Clarification on the base year of the trip generation is required.
 - No Hertfordshire sites have been included in the committed development. Application 22/01187/MOA for 1,200 dwellings and other uses should be reviewed among other applications. Models should be updated accordingly.
 - Dacorum car parking standards must be followed.
 - HCC expect all parking to benefit from either live or passive EV charging.
 - Cycle parking to include a proportion (5%) for non-standard cycles.
- An additional 7 day traffic survey was undertaken in October 2022.
 - Section 7 of the TA includes an assessment of the proposed employment using the TRICS database.
 - It should be noted that Ref: 22/01187/MOA was refused by the Council and is currently the subject of an appeal. As such, the proposals cannot be defined as committed development. Nonetheless, the TA has includes this development within the baseline.
 - In accordance with these comments as part of the Framework Travel Plan (included within Appendix 6 of the Transport Assessment) each home with a garage or driveway, the benefits from an electric car charging points.

- A Construction Traffic Management Plan must be conditioned.
 - We anticipate construction management conditions to be applied and welcome engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being a cross boundary application.

- Detailed comments from the Sustainable Transport Team on the Framework Travel Plan have been provided separately.
 - The Applicant has not yet received comments from Herefordshire County Council Highways in respect of the Framework Travel Plan. The Travel Plan Framework has however been amended to reflect the changes to sustainable transport provision including bus provision and a mobility. The provision of a Travel Plan will be attached as a condition to any future planning consent on the site.

- Full Travel Plan will be required from first occupation to 5 years post full occupation. An annual £1,200 Support Fee should be secured by S106.
 - The proposals include detail of offsite highway works that would be delivered via S278 Highway Act. Other commitments specified within the application documents include a Mobility Hub, extension of the existing bus service and securing of a Travel Plan. The TA confirms that the vehicle trips arising from the development will not cause any unacceptable impacts to the capacity of junctions within the locality. As such, further detail is sought in relation to the contributions that are sought by the HA. We welcome engagement with both LPAs and HAs in relation to proportionate planning obligations.

- Contributions will be sought via the S106 agreement.

Tring Rural Parish Council 10 July 2022 **Objection**

Key reasons include:

- Vehicular access to the site along Lukes Lane/Long Marston Road is inadequate to accommodate additional vehicular movements. There is little/no scope to widen the access roads and there are no pavements. The junction at the Gubblecote is already dangerous. Traffic concerns were raised along with the ability of HGVs accessing the junction by the Queens Head Public House.
 - There is no indication on how the school will be built or funded. Identifies that there would be a shortage of education places in the event that the development proceeded.
 - Shortage of GPs
 - Refer to a longstanding drainage problem within this area particularly in Long Marston. The run-off from the proposed development is considered to be catastrophic to the land drainage of the area.
- These comments have been addressed in the **Transport Assessment and Travel Plan, Proposed Highway Improvement Plan (Ref.2497-F03 Rev I) and Site Access Plan (Ref. 2497-F04 Rev. B)**
 - Please refer to the enclosed **Planning Statement**. Details such as the timing of delivery and contributions towards school provision will be agreed with the LEA and LPAs and during S106 discussions.
 - Whilst attempts were made to engage with the CCG regarding potential onsite provision for a GP facility, interest was not forthcoming. Alternatively, a financial contribution has been requested by Hertfordshire and West Essex Integrated Care Board of £413,440. This will be for the expansion, reconfiguration and possible relocation of existing GP facilities and can be secured within the S106.
 - The scheme has incorporated Sustainable Drainage Features to mitigate potential flood risk. Please refer to the enclosed Flood Risk Assessment and

		<ul style="list-style-type: none"> The sustainability of the proposed development and its location is questioned and it is considered that it would have an adverse effect on neighbouring villages. 	<p>Drainage Strategy which confirms the development will not increase the risk of flooding downstream.</p> <ul style="list-style-type: none"> ➤ Air quality and noise assessments have been carried out which confirm that there are no significant impacts. Construction mitigation measures can be secured via appropriately worded condition. Moreover, the proposals will benefit neighbouring villages through the provision of onsite facilities which will be accessible to the wider community.
		<ul style="list-style-type: none"> The proposals are not considered to be compliant with Policy D3 of the Vale of Aylesbury Local Plan. Aylesbury Vales five-year housing land supply position statement (published in April 2022) is referred to and indicates that the target for delivering housing is met. 	<ul style="list-style-type: none"> ➤ Please see the submitted Planning Statement. The applicant considers the scheme compliant with planning policy. ➤ Please see the submitted Planning Statement which provides commentary on Aylesbury Vales five-year housing land supply.
Tring Parish Council	8 August 2022	<ul style="list-style-type: none"> Further comments relating to the Parish Council undertaking research and enquiries and the status of this site as brownfield land. 	<ul style="list-style-type: none"> ➤ Under the National Planning Policy Framework the land constitutes previously developed land. The Sites status as previously developed land was agreed during the determination period of the original application.

Other

BPA Head	15 August 2022	<p>Comment</p> <ul style="list-style-type: none"> • BPA have not been consulted by Dacorum Borough Council on this application. • The proposed works are in close proximity to a high-pressure petroleum pipeline system and BPA wish to ensure that any works in the vicinity of the pipeline are carried out in accordance with safety requirements. • The area affected is identified as a proposed orchard as well as emergency vehicle and pedestrian access. There is a requirement to ensure that the easement is kept protected and this means that there are heavy restrictions, which if any trees and plants can be in place over the easement. • The Key Points include: <ul style="list-style-type: none"> – Any construction must be kept to a minimum of 6m from the pipelines; – All excavations within 6m of the pipeline must be approved and supervised by BPA; – The exact location of the pipeline to be marked by BPA in consultation with the developer prior to detailed design; – Nominal cover is only 0.9m; 	<ul style="list-style-type: none"> ➤ Please refer to the supporting Utility Feasibility Report. ➤ The application is supported by a Utility Feasibility Study which identifies the location of the BPA pipeline. The study confirms a small section of the pipeline falls within the site boundary, located within the southernmost section where no development (other than tree planting) is proposed. The pipeline is noted to exit the site and traverse Lukes Lane. The Study identifies that BPA should be consulted as detailed designs are drawn up to ensure that designs comply with their requirements. This engagement will be undertaken by the end developer. At outline stage, the proposals do not conflict with the safety requirements or easements associated with the pipeline.
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- Normal vertical clearance for new services is 600mm;
 - These pipelines are protected by cathodic protection and the Applicant should consult with BPA if services are laid;
 - Heavy Vehicular crossing points are to be approved before use across the easement;
 - Tree planting is prohibited within the easement;
 - No buildings can be located within the Pipeline easements;
 - No lowering or significantly raising of ground throughout the easement;
 - A continuous BPA site presence will be required for works within the easement;
 - Utility crossings may require a formal crossing consent.
- When planning works which involve crossing or working within the easement of the pipelines, the following will be requested before works can start:
 - A confirmed of proposed programmed start date for the works;

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- A detailed description of the proposed works;
 - A plan of the work area;
 - Drawings and a method statement for the written approval of BPA.
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Appendix 7 – Public Comments

AINA3004 Upper Wellington – Buckinghamshire Council (Aylesbury Vale) & Dacorum Council Public Comment Tracker

May 2023

Project:	AINA3004 – Upper Wellington	Description of Development:	'Outline Planning permission for approximately 320 residential (Use Class C3), a primary school, a local centre comprising community facilities (Use Class F2) and a rural enterprise hub (Use Classes E) together with a mobility hub, open space, drainage and supporting infrastructure. New vehicular and pedestrian access off Long Marston Road with all other matters reserved.'
Local Planning Authority:	Buckinghamshire Council (Aylesbury Vale area)		
Planning Reference:	22/02189/AOP and 22/01678/MOA		
Validation Date:	16/06/2023		
Consultation Dates:	28 June – 26 July 2022		
Target Determination Date:	Withdrawn		

Introduction

The table below provides a summary of the key themes raised by members of the public during the consultation period of the applications' referred to above. A total of 285 comments were received. The key themes from the comments received have been taken into consideration and have informed the updated reports that support the re-submission application. The table below includes a summary of how the applicant has addressed these key themes and where within the submission documents further information can be found.

Key Themes	Applicant Response
<p>1. Traffic Generation - Objections have been raised by local residents within the administrative areas of Aylesbury Vale and Dacorum with regards to the impact of the scheme on the existing road infrastructure and its ability to accommodate additional vehicular movements.</p>	<p>Please see submitted Transport Assessment (TA).</p> <p>Junction capacity testing has been undertaken and has been informed by additional traffic counts. It considers the likely vehicle movements generated by the development alongside background growth and the impact this may have on the local highway network. The TA confirms no unacceptable impacts on the capacity or safety of these junctions.</p> <p>A key benefit of the proposals includes offsite highway improvements along Lukes Lane/Long Marston Road which will improve accessibility for vehicles such as buses with the introduction of priority junctions and traffic calming measures, including widening and extension of the existing footpath. This presents a significant improvement to the existing road infrastructure at this location which will improve connectivity to nearby villages.</p> <p>To reduce trip generation and encourage residents to use an alternative to the private car, the Framework Travel Plan is included within Appendix 6 of the Transport Assessment. The following Travel Plan measures will be implemented:</p> <ul style="list-style-type: none"> • Appointment of Travel Plan Co-ordinator. • The delivery of a Mobility Hub which is designed to accommodate public and shared mobility modes including bus stops, a car club and E-bike provision. • Residents Travel Pack. • Travel Awareness and Information. • Promotion of Lift Share Scheme. • Encouraging Walking and Cycling via improved pedestrian, cycle and bus routes. • Encouraging Travel by Public Transport.

	<p>A further commitment, outside of the S106, is a CoWheels Car Club Contribution and a Bus diversion contribution to provide a half hourly service during the week, between 07:35 and 18:00 and on an hourly basis between 08:00 and 17:00 on Saturday.</p>
<p>2. Highway Safety - Concerns were raised on the impact of the scheme on highway safety with a particular focus on the impact on pedestrians and cyclists.</p>	<p>Please refer to the Proposed Highway Improvement Plan (Ref. 2497-F03 Rev I) and Site Access Plan (Ref. 2497-F04 Rev. B).</p> <p>The Transport Assessment has been informed by a review of accident data and a Safety Audit of the proposed access.</p> <p>A safe foot and cycle path network has been incorporated throughout the site. To further promote pedestrian and cyclist movements and enhance safety. The following highway measures are proposed:</p> <ul style="list-style-type: none"> • The connection to and the widening of existing footways along Long Marston Road along with the widening of the carriageway. • A new section of footpath along with improvement works to the existing pedestrian infrastructure on Long Marston Road and Vicarage Road to facilitate safe movement to Marsworth Village and other neighbouring communities. • Following the consultation with the Highways Authority on the original application submission, the provision of pedestrian improvements to the Canal bridge along Vicarage Road are proposed via a signalised junction and 1m coloured surface for pedestrians. • A reduced speed limit of 30mph at the site area. • A diversion and extension to the frequency of an existing bus service into the site.
<p>3. Access – Objections were raised on the singular access point via Long Marston Road.</p>	<p>Please see submitted Site Access Plan (2497-F04 Rev. B) and Transport Assessment and Travel Plan.</p>

The proposed vehicular access via Long Marston Road is the only access where detailed approval is sought at outline stage. The Applicant considers one point of access to be acceptable and no objection in relation to the principle of this has been raised by the Highways Authorities. Nonetheless, if additional accesses are considered to be of benefit there is opportunity for further accesses to be provided and the detail of which can be submitted at reserved matters stage.

Since the original applications were submitted, the 7-day traffic counts which recorded the existing speeds and number of movements took place in October 2022. This data has informed the Transport Assessment and confirms the proposed visibility splays and reduced speed limit to 30mph at the site access are appropriate.

In addition, a Stage 1 Safety Audit has been undertaken and has informed the proposed access. The Audit confirms that the singular vehicular access into the site from Long Marston Road and the suitability of the proposed visibility splays.

-
4. **Scale of Development** - The proposals were considered to be an overdevelopment to the local area.

The scale of the development is not considered to be in keeping with the local area and its rural setting.

Please refer to the supporting Landscape Strategy (Drawing No. edp6433_d012h); the Highways Planting Strategy (Drawing No, edp6433_d014a) and the Character Assessment within the Design and Access Statement.

The proposed development will be of a comparable size, scale and likely population to existing villages in the locality.

The supporting Landscape and Visual Appraisal considers the development to have some level of negative effect upon the baseline character and visual amenity of the site. However, the effect to visual amenity is limited to within 1km from the site boundary and up to 1.5km to the north (to Westend and Southend Hills). The Appraisal confirms that the existing landscape fabric will be enhanced by providing increased tree cover, infilling and replanting of hedgerows contributing to the enhancement of landscape character.

The following landscaping measures have been considered to mitigate the schemes visual impact on the surrounding rural area:

- Retention of existing vegetation around the boundaries and increased tree planting of native species and landscaping along the site boundaries.
- Street trees are incorporated throughout the scheme to break up the roofscape and soften the development in view from higher ground.

5. Air and Noise Pollution

A Noise Assessment and Air Quality Assessment are submitted in support of the application – these consider potential environmental impacts upon existing residents during construction and recommend that measures are put in place to minimise impacts. The Noise Assessment concludes that mitigation measures will be secured to minimise amenity impacts to sensitive receptors (i.e. nearby residents along Lukes Lane) during construction. Typical measures include the submission of a Construction Environmental Management Plan for the Council’s approval prior to the commencement of development. The Environmental Health Officers for both Councils’ confirmed that such measures will be secured by planning condition.

The proposals will not generate unacceptable amenity or health impacts to existing residents.

6. Negative Impact on the existing biodiversity and wildlife.

Please see submitted Arboricultural Impact Assessment, the Ecological Impact Assessment and the shadow Habitats Regulation Assessment for further detail.

The re-submission includes consideration of the arboricultural, ecological and landscape impacts associated with the development alongside the proposed offsite highway works. The proposed landscape strategy indicates where new planting and improvements to existing linear vegetation can be located along the verge of highway land, with the Ecological Impact Appraisal confirming that on balance, the loss of trees to accommodate the highway works are suitably mitigated by the proposed replanting such that it will generate a biodiversity gain.

With regard to the site itself, new tree planting, habitat creation including ecological and landscape enhancements have been incorporated across the site to achieve an overall Biodiversity Net Gain of c.10%. These measures include the retention of the existing vegetated boundary, increased tree cover and new woodland buffers, infilling and replanting of hedgerow wildflower grassland, native scrub and wet ponds.

7. The Schemes Potential to Increase Flood Risk Offsite

Please refer to the enclosed Flood Risk Assessment and Drainage Strategy for further detail.

The site falls within Flood Zone 1, the lowest probability of flooding. There is a small section along the eastern boundary which is susceptible to surface water flooding, however, this area is not proposed for development and the

proposed improvements to the existing watercourse from a piped culvert to an open swale will capture the surface water during storm events, providing a betterment to the sites current drainage arrangements.

Measures have been taken to ensure that flood risk is not increased to the surrounding area, the following measures are proposed and will be incorporated across the development site:

- Sustainable Drainage Systems including a series of swales and detention basins to control surface water flow.
- A network of drainage ponds are located in the green space and include the opening up of an existing culvert within the eastern section of the site into an open swale which will capture a greater volume of surface water in storm events.
- To ensure that peak discharges from the developed land is not increased from the baseline rates, surface water will be discharged at QBAR (4.42l/s/ha).
- A commitment to Sustainable Urban Drainage Measures (such as rainwater harvesting and permeable paving) at detailed design stage.

8. **Increased pressure on Local**

Infrastructure – concerns were raised on the how the existing Schools, Healthcare Services, Public Transport and Public Open Space will cope with the increased population.

Please see submitted Planning Statement.

The proposals include provision of onsite infrastructure, including a primary school (with land set aside for its future expansion), public open space, a local centre and rural enterprise hub (with shop/café/business units for lease), that will serve new residents and benefit existing residents within nearby villages. The applicant is also committed to highway and footway improvements, provision of a Mobility Hub and an extension to the existing bus service to encourage residents to travel sustainably and provide improved accessibility into the site from nearby villages. Financial contributions which are proportionate to the population generated by the development will also be secured towards the expansion and improvements of existing health (GP) and education (secondary school) provision.

9. History of the Site and its Agricultural Land Status Prior to World War II	<p>The site is defined as brownfield/previously developed land. This was agreed with the Planning Officers during the determination period of the original application.</p>
	<p>The original application was supported by a Built Heritage Assessment and Archaeological Assessment. Responses received from the Councils' conservation officers and county archaeologists concurred with the findings of the reports and raised no objection to the proposed demolition of the buildings. Planning conditions will be attached to any permission so that a record of the buildings onsite is carried out prior to demolition. The proposals provide an opportunity to harness the sites history through the introduction of a heritage trail within the site itself.</p>
10. Contaminated Land Concerns related to the sites former use as a World War 2 Airfield.	<p>A Phase 1 Geo-environmental Site Assessment is enclosed within the submission documents and identifies the potential contamination sources present onsite due to its previous use. The report considers the site to be at Medium to High risk from unexploded weaponry and has recommended further surveys are undertaken. The proposed development will be carried out in accordance with this guidance.</p>
	<p>The proposals are considered to be of significant environmental benefit as it will ensure appropriate remediation of existing sources of contaminant onsite. We anticipate contamination conditions to be applied and welcome engagement with both LPAs to ensure appropriately worded conditions are secured and are consistent in the context of this being an ex-MOD site.</p>
11. Impact on the Chiltern Beechwoods SAC	<p>Please see submitted shadow Habitat Regulation Assessment.</p> <p>It is acknowledged that the site falls within the zone of influence of the Chilterns Beechwoods Special Area of Conservation which requires mitigation from recreational pressure. This has been addressed through the submission of a shadow Habitat Regulations Assessment and securing of Suitable Alternative Natural Green Space (SANG) and Strategy Access Management and Monitoring Payments (SAMM). Discussions are ongoing with Natural England to ensure the proposals suitability mitigate its recreational impacts upon the Chiltern Beechwoods SAC.</p>

12. **The proposals increased pressure on utilities** (specifically on water and sewage)

A Utility Feasibility Report is submitted with this outline application. The report assesses the proposed developments impact on existing electricity, gas, water and telecoms infrastructure and considers what reinforcements may be necessary to serve the development. The report confirms that the proposed development can adequately be served by the required utilities through upgrading of existing and/or installation of new infrastructure. The report also identified an opportunity to improve existing infrastructure arrangements (namely broadband) for residents in the locality.

Prior to the commencement of development, liaison will take place with all utility providers (including water and sewer operators) to ensure there is appropriate capacity within the network to serve the development and if not, upgrading to these facilities will be carried out and in place prior to the occupation of the development.

13. **Pressure on employment** – residents refer to there being a lack of employment opportunities within the surrounding area.

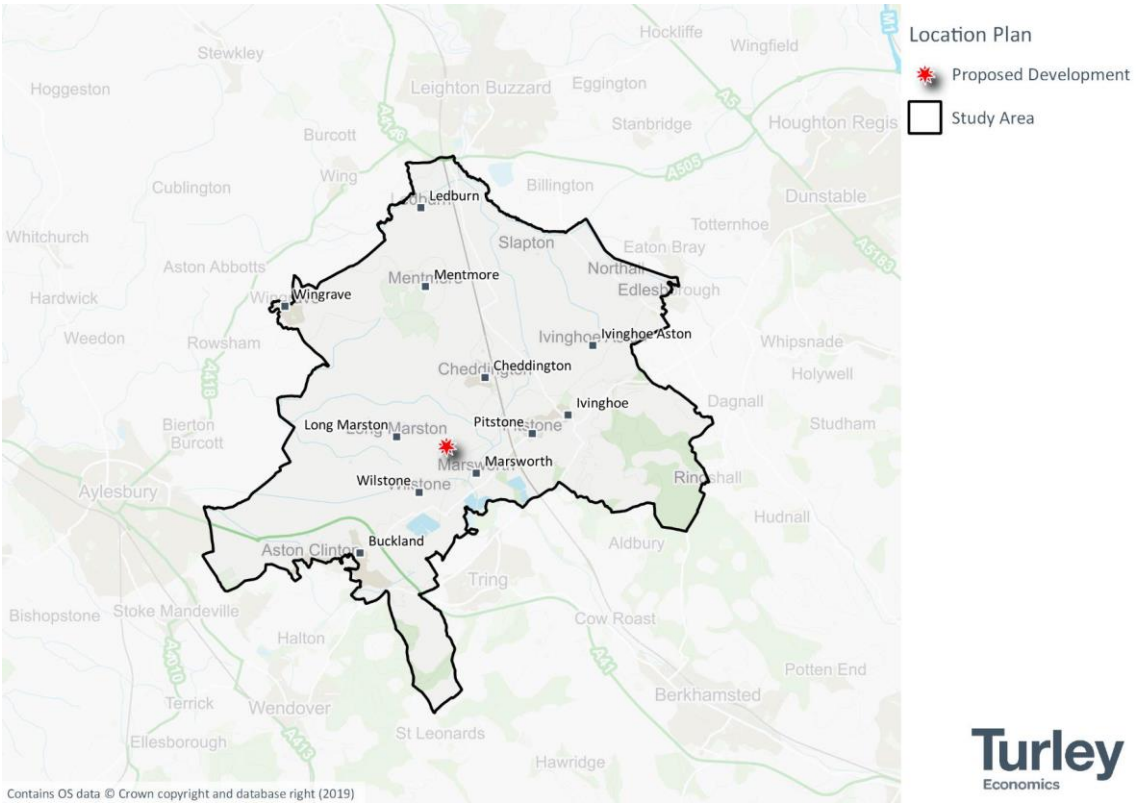
Please see submitted Economic and Social Benefit Statement.

The Applicant seeks to improve employment opportunities via a Rural Enterprise Hub (REH). Following the applications original submission, the Applicant engaged further with Buckinghamshire Business First in October 2022 with regards to the likely form of the REH that would meet local demand. The proposals will provide opportunities for employment on site through the provision of 940sqm of commercial units for small and local enterprises.

The application is supported by an Economic and Social Benefit Statement which considers the employment opportunities and indirect benefits of the development on the local economy. This includes:

- Approximately **80 FTE jobs** per annum **during construction**, and **55 FTE direct jobs** per annum from the onsite provision of the primary school, local centre and rural enterprise hub.
- Around a **£51 million GVA** contribution to the wider economy during construction. Including a **£4.7 million GVA** contribution to the local and wider economy during operation.
- A gross resident income of **£12 million**, which will increase **local spending power**.
- Around £800,000 in Council Tax payments annually and £90,000 in Business Rates to help deliver public infrastructure and services within the locality.

Appendix 8 - Developer Analysis Study Area



Appendix 9 – Development Plan Policies

Planning Policy Context

The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”

The site is situated in both the Vale of Aylesbury and Dacorum Council districts so the current ‘Development Plan’ for the site consists of the:

- Vale of Aylesbury Local Plan (2013-2033)
- The Local Plan for Buckinghamshire (expected adoption April 2025)
- Dacorum Core Strategy (2013-2031)
- Dacorum Site Allocations Development Plan (July 2017)

Other material considerations include:

- National Planning Policy Framework
- National Planning Practice Guidance (inc National Model Design Code)
- Supplementary Planning Documents- Vale of Aylesbury
- Supplementary Planning Document- Dacorum
- Dacorum’s Emerging Local Plan update (2020-2038)
- Dacorum Council Advice Notes

Vale of Aylesbury Local Plan (2013-2033)

The Vale of Aylesbury Local Plan was adopted 15th September 2021. This document sets out the vision and strategic context for accommodating and managing growth in the area of Aylesbury Vale until 2033.

This plan indicates protected areas, areas where development will take place and outlines policies which determine the outcome of planning applications.

The key policies are summarised below.

STRATEGIC

S1 Sustainable development for Aylesbury Vale states that development will only be permitted if it complies with the NPPF’s principles of sustainable development. Development should contribute positively to mix of uses, community needs, reuse of vacant land or underused brownfield land. Development should integrate communities, minimise impacts on heritage, provide sustainable modes of transport and enhance access to education, employment and community facilities.

S2 Spatial Strategy for Growth states that to meet Government objectives and existing and future housing needs of people in Aylesbury, the council must secure a minimum delivery of 28,600 new homes and 27ha of employment land.

S5 Infrastructure states that new developments must provide appropriate transport, utility, community and green infrastructure (on and off site) which further support sustainability objectives outlined in the Local Plan.

S7 Previously Developed Land states that reuse of brownfield sites in sustainable locations will make more efficient and effective use of land in Aylesbury Vale.

HOUSING

H1 Affordable housing states that residential developments of 11 or more dwellings on a site of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site.

H5 Self/Custom building housing states developments proposing 100 dwellings or more will be expected to provide a percentage of serviced plots for sale to self/custom builders.

H6a Housing Mix states that new residential developments will be expected to provide a mix of homes to meet current and future requirements in the interests of creating socially mixed and inclusive communities and meeting housing need.

H6b Housing for older people states proposals for C2 older people accommodation will be granted planning permission where this is in a sustainable location for amenities and services.

H6c: Accessibility states all developments will be required to meet at least category 2 accessible and adaptable dwelling standards. A minimum of 15% of affordable homes will be required to meet M4 (3)(1)(a) and (b) and M4 (3)(2)(b) unless unviable.

EMPLOYMENT

E2 Other Employment Sites states that reuse and/or redevelopment of employment sites to a non-employment use will normally be permitted, subject to certain criteria being met.

TRANSPORT

T1 Delivering the sustainable transport vision states that more sustainable forms of transport will be encouraged to ensure new residential and employment developments do not impact the existing public transportation and highway network.

T4 Capacity of the Transport Network to Deliver Development states that new development will be permitted where there is evidence of sufficient capacity in the transport network to accommodate the increase in travel demand as a result of the development.

T5 Delivering transport in new development states that transport and new development will be permitted if transport pressures caused directly from that development are mitigated.

T6 Vehicle Parking states that development must provide an appropriate level of parking.

T7 Footpaths and Cycle Routes states that development proposals must provide for pedestrian and cycle movement, connected where appropriate to the existing network.

T8 Electric Vehicle Infrastructure states that EV charging points will be provided: 1 EV per house, 10% EV parking for flats, 2 EV for other development with less than 50 parking bays, and a further 4% for development with more than 50 parking bays.

BUILT ENVIRONMENT

BE1 Heritage Assets states that all development, including new buildings, alterations, extensions, changes of use and demolitions, should seek to conserve heritage assets in a manner appropriate to their significance, including their setting, and seek enhancement wherever possible.

BE2 Design of New Development all new development proposals shall follow the guidance set out within the Council's design SPD.

BE3 Protection of Amenity of Residents states that development should achieve satisfactory level of amenity for future residents.

BE4: Density of New Development proposed densities of developments should effectively use the land and reflect those of their surroundings and be determined on a site-by-site basis. For large scale developments, higher densities should be situated in the centre of the site and lower densities located on the edge.

NATURAL ENVIRONMENT

NE1 Biodiversity and Geodiversity states that biodiversity, geodiversity and the natural environment will be protected and enhanced.

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 effects can be fully mitigated.

Development proposals that would lead to an individual or cumulative adverse impact on a Site of Special Scientific Interest will be permitted in exceptional circumstances, if the benefits of the development at 'this site' outweigh the impacts it is likely to have on the feature; and/or the loss can be compensated or mitigated to enhance biodiversity/geodiversity.

Policy NE1 identifies a number of ways to achieve the protection and enhancement by (inter alia):

- A biodiversity net gain is sought by protecting, managing, extending and enhancing existing biodiversity resource. A methodology for measuring gains will be set out in the Biodiversity Accounting SPD¹.
- Where harm cannot be avoided, seek to mitigate and compensate on site first, then offsite.
- Ecology surveys are expected to inform planning applications.
- Development is expected to promote site permeability for wildlife.

¹ Noted to be consulted upon in March 2021 but not formally adopted at the time of writing.

- If a development is identified to harm a biodiversity site of regional or local importance, affect a Priority Habitat or Local Nature Reserve, Policy NE1 sets out the approach to assessing the development, whereby the need and benefits of the development must significantly and demonstrably outweigh the harm it would cause to the biodiversity site, and the loss can be mitigated and compensation provided to achieve a net gain.

NE4 Landscape Character and Locally important landscape states that development must recognise the individual character and distinctiveness of a particular landscapes character areas and avoid or mitigate harmful impact.

NE5 Pollution, Air Quality and Contaminated Land states that assessments of noise, lighting, air quality and contamination are required where development may have an adverse impact or be impacted by existing conditions. If levels are exceeded the development will only be permitted if impacts on surrounding land are reduced in accordance with Government Guidance.

NE9 Trees, Hedgerows and Woodland states development should seek to enhance and expand the district's tree and woodland resources. Where the loss of trees is acceptable, adequate replacement provision will be required.

COUNTRYSIDE

C3 Renewable Energy states that developments which use renewable energy will be encouraged to minimise energy use and achieve greater efficiency.

DETAILED INFRASTRUCTURE

I1 Green Infrastructure states new developments of 10 or more homes will be required to meet the prescribed accessible natural green space standards.

I2 Sports and Recreation states that proposals for new development should include sufficient sport and recreation provision commensurate to the need generated by the proposals. New developments of more than 10 home will be required to meet the Council's adopted standards.

I3 Community Facilities and Assets of Community Value states that in considering applications for residential development, the Council will consider the need for new community facilities arising from the proposal.

I4 Flooding states that all developments requiring a Flood Risk assessment must adhere to SFRA. Flood risk from all forms of flooding must be minimised, and development layouts should be informed by drainage strategies incorporating Sustainable Drainage Systems.

I5 Water Resources and Wastewater Infrastructure states that development proposals must seek to maintain or improve water quality, adequate water resources, wastewater collection, and promote sustainability in water use.

Other noteworthy information within the Local Plan includes:

- Paragraph 1.47 states that over the past five years, an average of 29% of new homes have been built on brownfield sites. This percentage has decreased in the past 5 years and is expected to continue to decrease in the future as the supply of available brownfield sites decreases.

Supplementary Planning Documents Vale of Aylesbury

Adopted SPDs and guidance of relevance to the proposals include: AVDC Affordable Housing Interim Position Statement (November 2019); Sports and Leisure Facilities SPG (2004) and Companion Document (2005); Biodiversity Net Gain SPD (July 2022).

Emerging SPDs - A number of SPDs are intended to be produced to support implementation of policies contained within the VALP. Those which may be of relevance to the application, once adopted, include:

- SPD 4- Affordable Housing
- SPD 5- District Design Guidance
- SPD 6- Biodiversity and Geodiversity
- SPD7 – Sports, Leisure and Community Facilities

Emerging Local Plan for Buckinghamshire (expected adoption April 2025)

- Buckinghamshire council came into effect 1st April 2020, bringing together four district councils- Aylesbury Vale, Chiltern, South Bucks and Wycombe.
- Work on the Local Plan is currently underway for expected adoption April 2025.
- To date, there has been two calls for Brownfield sites- the first 6th April 2021 and second 6th December 2021. This is considered important to identify land that could be reused and suitable for redevelopment or regeneration for residential use.

Dacorum Core Strategy (2013-2031)

The Dacorum Core Strategy was adopted 25th September 2013 and is the first of the documents which will make up the boroughs new local plan (being prepared for adoption November 2022).

The documents purpose is to anticipate and manage change in Dacorum until 2031. Paragraph 1.1 states that the document sets out a framework which balances the need for new development and infrastructure against the need to maintain the environmental assets and character of the borough.

To achieve the vision in the Core Strategy, Strategic Objectives have been set out and include:

- a) Strengthening Economic Prosperity
- b) Providing Homes and Community Services
- c) Looking After the Environment

The key policies are summarised below:

NP1 Supporting Development states the council will take a positive approach to developments which reflect the presumption in favour contained in the NPPF.

THE STRATEGY

CS1 Distribution of Development states that development that supports the vitality and viability of local communities, causes no damage to the existing character of the surrounding area and is compatible with policies protecting or enhancing rural areas will be supported.

CS2 Selection of Development Sites states that developments within defined settlements will be chosen in accordance with previously developed land and buildings, areas of high accessibility and other land.

CS7 Rural Areas refers to the type and form of development that is suitable within rural areas, which includes (inter alia) 'social, community and leisure uses'.

CS8 Sustainable Transport states that new development will contribute to a well-connected and accessible transport system. Development will contribute to the implementation of strategies set out in the Local Transport Plan and Local Urban Plan.

CS9 Management of Roads states that traffic generated from new development must be compatible with the location, design and capacity of the current and future operation of the road hierarchy.

CS10 Quality of Settlement Design states that new development should follow the '3 step approach to successful design'- be spatially aware, consider design and access, and sustainable design and construction.

CS12 Quality of Site Design states that developments should provide safe access, sufficient parking, retain/replace trees, maintain/enhance visual amenity.

CS13 Quality of the Public Realm states that new developments should contribute to the quality of the public realm in terms of active frontages and natural surveillance, well-connected and permeable, promote pedestrian friendly places, include an interactive and sustainable realm.

PROVIDING HOMES AND COMMUNITY SERVICES

CS17 New Housing states that between 2006 and 2031 an average of 430 additional dwellings will be provided annually.

CS18 Mix of Housing states that new developments will provide a choice of homes. The appropriate mix of housing is guided/determined by strategic housing market assessments and housing needs surveys and site-specific considerations.

CS19 Affordable Housing states affordable homes will be provided on a minimum of 5 dwellings per 0.16ha. 35% of new dwellings should be affordable. A minimum of 75% should be for rent.

CS23 Social Infrastructure states that all new development will be expected to contribute towards the provision of social infrastructure. Social infrastructure which provide services and facilities to the community will be encouraged.

LOOKING AFTER THE ENVIRONMENT

CS25 Landscape Character states that proposals will be assessed for their impact on landscape features to ensure they conserve or improve the landscape quality, character and condition. Developments should take into account the Dacorum Landscape Characterisation and advice contained within the Hertfordshire Historic Environment Record.

CS26 Green Infrastructure states development will contribute towards the conservation and restoration of habitats and species and strengthen biodiversity corridors.

CS27 Quality of the Historic Environment states that all development will favour and positively conserve heritage assets.

CS28 Carbon Emissions Reductions states that carbon emission reductions will be sought in building design and construction and the use of transport.

CS29 Sustainable Design and Construction states new developments will comply with the highest standards of sustainable design and construction as possible. The policy identifies 12 principles which the proposal should satisfy.

CS32 Air, Soil and Water Quality states that new developments are required to support improvements and maintain air quality standards, remediate contaminated land and improve water quality inline with the Water Framework Directive, Environmental Agency and Natural England Guidance.

Other important points to note:

- **Paragraph 8.14** states that in all locations of development the emphasis will be on optimising the effective use of existing land and previously developed sites within settlements.
- **Paragraph 20.17** states that the development of land will broadly be prioritised with the re-use of previously developed sites first.

Dacorum Site Allocations Development Plan (July 2017)

The Dacorum Site Allocations Development Plan Document was adopted in July 2017 and is the second document that will make up the Boroughs Local Plan.

The document sets out how the policies and proposals in Dacorum's Core Strategy (adopted September 2013) will be delivered.

The key policies have been outlined below:

SA3 Improving Transport Infrastructure states that opportunities will be taken to enhance footpath and cycle networks and links and support bus patronage.

T/22 proposes the provision of an improved cycle connection on and off road between **Tring Station and Pitstone**. This is anticipated to be delivered in the long-term (between 2021 and 2031).

Dacorum's Emerging Local Plan Update (2020-2038)

The New Dacorum Local Plan (2020-2038) is emerging in conjunction with its parent document, the South West Herts Joint Spatial Plan. The Local Development Scheme (Jan 2022) indicates that the new local plan is in its early states of preparation, with public consultation on the draft version of the Local Plan (Regulation 18) in Jun 2023 followed by formal Regulation 19 publication in Jun 2024 and, following independent examination, adoption is anticipated in 2025.

The consultation version of the new Local Plan, 'Sustainable Development Strategy' identifies the need for the construction of 16,899 new homes equating to 922 a year; 2,731 of which are needed in Tring by 2038.

The new Local Plans Objectives have been outlined as:

- Delivering Dacorum's future with homes for everyone
- Generating a vibrant economy with opportunities for all
- Mitigating and adapting to climate change
- Conserving and protecting the natural environment
- Ensuring an attractive and valued built environment
- Promoting and facilitating sustainable transport and connectivity
- Supporting community health, well-being and cohesion
- Enabling the delivering of infrastructure

Supplementary Planning Documents - Dacorum

The following supplementary planning guidance and documents are considered to be of relevance to the proposed development:

- Dacorum Strategic Design Guide SPD (February 2021)
 - Part 1: Design Process
 - Part 2: Design Principles
- Affordable Housing SPD (September 2013)
- Energy Efficiency and Conservation SPD (September 2013)
- Area Based Policies SPG (May 2004)
 - Part 4: Development in Residential Area- Tring
- Environmental Guidelines (May 2004)

Dacorum Council Advice Notes

The following advice notes are considered to be of relevance to the proposed development:

- Sustainable Development Advice Note (December 2016)
- Sustainable Drainage Policy Statement (February 2015)

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