

**STATEMENT OF COMMON GROUND: GOMM VALLEY
WYCOMBE DISTRICT COUNCIL AND AVIVA LIFE AND PENSIONS
31 August 2018**

Ownership and management of the Gomm Valley site

It is common ground between WDC and Aviva Life and Pensions Ltd. that the following statement correctly reflects the ownership and management of the Gomm Valley site according to Aviva Life and Pensions Ltd:

The Gomm Valley site is owned by Friends Life and is managed by Aviva Life and Pensions Ltd.

Up to and including September 2016, Axa REIM managed the Gomm Valley site on behalf of Friends Life. Axa REIM assisted WDC in the preparation of the Gomm Valley and Ashwells Development Brief (adopted July 2017, 'the Development Brief').

In September 2016, the management of Gomm Valley site transferred to Aviva Life and Pensions Ltd. In May 2017, Human+Nature was appointed by Aviva Life and Pensions to conduct a rigorous review of the Axa REIM development proposals in terms of urban and landscape design, environmental constraints and opportunities and development capacity and mix. Human+Nature has subsequently been appointed as development manager and assembled a team to advance a different set of development proposals.

History of Aviva / Human+Nature development proposals for the Gomm Valley site

It is common ground between WDC and Aviva Life and Pensions Ltd. that the discussions set out in Appendix 1 have taken place in relation to the Aviva / Human+Nature development proposal.

Future programme: Aviva / Human+Nature development proposals

It is common ground between WDC and Aviva that the following programme has been provided by Aviva up to submission of an outline planning application:

Aviva intends to participate in Wycombe District Examination Hearings on 4 September 2018 (Matter 7) as well as any consultation on modifications to the Plan suggested by the Inspector thereafter.

By 21 September 2018, Aviva / Human+Nature will submit the following information to WDC to address comments arising from pre-application discussions, including from WDC, Buckinghamshire County Council and participants at the public consultation events:

- A draft Ecological Assessment;
- A draft Landscape and Visual Impact Assessment (LVIA) to WDC, including wireframe photomontages with proposed development-edge conditions illustrated;
- An updated draft of the proposed masterplan;
- A draft set of parameter plans for the outline planning application; and
- A draft schedule of planning application documents for the outline planning application.

Buckinghamshire County Council has confirmed to Aviva / Human+Nature that the highways modelling work will be returned by end of September / start of October 2018.

Aviva / Human+Nature have confirmed in principle (exact date subject to availability) that they will meet with WDC in October 2018 under the terms of the WDC PPA to agree the planning application package. In accordance with the WDC PPA, comments will be provided by WDC no later than 10 working days after the meeting.

Aviva / Human+Nature will submit an outline planning application in November 2018.

Is the Gomm Valley and Ashwells allocation (Policy HW6) soundly based?

It is common ground between WDC and Aviva that the Gomm Valley and Ashwells allocation (Policy HW6) is soundly based, being a sustainable location for new development as proved by the comprehensive evidence base and sustainability appraisal process.

Is the Gomm Valley and Ashwells allocation (Policy HW6) deliverable?

It is common ground between WDC and Aviva Life and Pensions Ltd. that:

- The Gomm Valley and Ashwells allocation (Policy HW6) is deliverable;
- An increase in residential density within the site is achievable and deliverable in principle subject to a bespoke design solution; and
- The Aviva / Human+Nature proposals have the potential to make a greater contribution to WDC's housing land supply by providing an increased residential density across the site and improved housing delivery rates;

Aviva Life and Pensions consider that 945 dwellings could be delivered on the site and a minimum 800 dwellings is required to deliver a sustainable development proposal. The Council is unable to agree these figures based on current information.

Is the Gomm Valley and Ashwells allocation (Policy HW6) viable?

It is common ground between WDC and Aviva that they will work closely together on viability issues as the detailed scheme is prepared, including full sharing and scrutiny of costs and values.

Dwelling Capacity and associated Policy modification

It is common ground between WDC and Aviva that the indicative housing requirement for Gomm Valley should not be expressed as an 'up to' figure which could be misinterpreted as a cap on the amount of development that could be permitted by any future planning application. The housing requirement should be expressed as a 'minimum' or 'indicative' dwelling figure, with Aviva of the view that the requirement should be expressed as a 'minimum' figure and WDC of the view that it should be expressed as an 'indicative' figure.

WDC proposes that the following text be inserted into the supporting text to replace the current paras. 5.1.37 and 5.1.38.

5.1.37 Based on a conventional design approach (as set out in the adopted Development Brief for the site) the indicative capacity of the site is 520. This is likely to be about 400 for Gomm Valley, and about 120 for Ashwells. It is acknowledged that higher housing numbers may be achievable on the site where a high quality innovative and bespoke architectural response is adopted and/or a higher proportion of smaller dwellings form part of the mix. A bespoke architectural response would need to be robustly proven at the outline stage with detailed parameter plans and detailed illustrative supporting documents and plans.

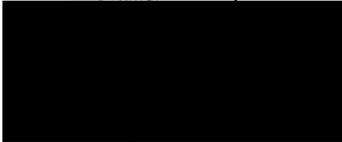
5.1.38 The Council has worked closely with local stakeholders and landowners to produce a development brief for the site. This was adopted in July 2017 and should be used to inform any planning application submitted for the future development of the site. When more technical work is undertaken, it may be demonstrated that there are better ways of delivering the objectives than

those set out in the brief. Should these improvements differ significantly from the brief, amendments will be required to those parts of the brief so affected”.

It is agreed that the above modifications are helpful and go some way to addressing concerns, however Aviva / Human+Nature maintain that the modifications advanced in its own position statement are necessary to secure certainty.

Signed

On behalf of Wycombe District Council



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On behalf of Aviva Life and Pensions



Date: 31st August 2018

Appendix 1 Engagement between Wycombe District Council and Aviva

On 20 June 2017, Aviva / Human+Nature met with Wycombe District Council (WDC) and agreed that the text should be inserted into the Development Brief to allow for a review mechanism. This was subsequently included in the adopted Development Brief at page 3, as follows:

“The brief sets out clear objectives, and provides proposals on how these objectives can be best achieved. However, when more technical work is undertaken, it may be demonstrated that there are better ways of delivering the objectives than those set out in the brief. Should these improvements differ significantly from the brief, amendments will be required to that those parts of the brief so affected. This would require reconvening the liaison group and appropriate public consultation and must be done before any planning application containing such modifications could be considered positively.”

From July 2017 to September 2017, Aviva / Human+Nature conducted a review of the Development Brief scheme. This included participation from WDC Planning and Urban Design Officers at a workshop held on 1 September 2017.

On 10 November 2017, Aviva / Human+Nature met with WDC Development Control and Planning Policy teams to discuss:

- 1) A Planning Performance Agreement (PPA) with WDC and Buckinghamshire County Highways team to take forward the Aviva / Human+Nature proposals in a collaborative way; and
- 2) Representations on the Wycombe District Local Plan Regulation 19 Consultation to be made by Aviva Life and Pensions Ltd.

On 27 November 2017, Aviva / Human+Nature submitted representations to the Wycombe District Local Plan Regulation 19 Consultation, suggesting policy modifications to policies including Policy HW6: Gomm Valley and Ashwells.

In April 2018, Aviva / Human+Nature agreed a draft of the WDC PPA and with Buckinghamshire County Council for a transport/highways specific PPA including an undertaking to pay the authorities' costs arising. The WDC PPA was subsequently signed by both parties on 8 August 2018 and the Buckinghamshire PPA was signed by both parties on 22 June 2018.

The agreed purpose of the **WDC PPA** is as follows:

“This PPA relates to a revised development proposal for Gomm Valley advanced by

Aviva and Human Nature (Places) Ltd (the development). The objective of the development that is being proposed is to:

1. *To promote a development that will provide a greater amount of development at the site in an environmentally acceptable way.*
2. *Ensure that there is sufficient highway capacity to accommodate the transport needs of the development and to contribute towards wider transport objectives.*
3. *Demonstrate that acceptable provision is being made for car and non-car modes of transport.*
4. *Provide a road through the site from London Road to Cock Lane.*
5. *Take account of the need for Gomm Valley to be developed in a comprehensive manner*
6. *Provide for a phased development.*
7. *Ensure that the development has an acceptable impact on the landscape.*

8. *Ensure that the development has an acceptable impact on ecology.*
9. *Ensure that the proposal will meet the standards for good place making and urban design.*
10. *Ensure that the development addresses the constraints of the site.*
11. *Ensure the provision of infrastructure, amenities and services for the development.*

Meetings were held with WDC under the terms of the WDC PPA on the following dates with environmental information (design, landscape, ecology and highways) submitted prior to each meeting:

- 6 June 2018; and
- 31 July 2018.

On 21 August 2018, WDC issued its first stage pre-application comments to Aviva / Human+Nature. The comments were mixed. Some aspects of the proposal were supported, other aspects such as the LVIA work were inconclusive. The outcome of this response is due to be discussed at the next PPA meeting.

The agreed purpose of the **Buckinghamshire PPA** is:

"This PPA is intended to ensure that the forthcoming planning applications are based upon robust evidence in relation to highways, access and transport matters. More importantly, it should provide a framework for the pre-application stage of the project which is followed through to the submission of the relevant documents. In doing so, the PPA intends to:

1. *Agree the scope for the Transport Assessment, traffic modelling, and associated Travel Plan and for draft submissions to be reviewed, in order to minimise the need for any supplementary information to be provided after the application has been submitted;*
2. *Ensure regular and constructive dialogue between the Parties throughout the pre-application and post submission stages, by means of correspondence and meetings and to identify and determine issues and agree steps to resolve them wherever possible. Timescales for responses to correspondence and meetings are set out in Section 7 of this PPA.*
3. *Ensure that in its capacity and as future consultee on the Application, BCC will be in a position to provide fully reasoned and comprehensive comments to Wycombe District Council.*

The strategic traffic models held by BCC for the local area are a key element in taking the sites forward, Whilst the payment for running these models and the BCC consultant is outside of the PPA agreement, the PPA allows for BCC's element of discussions agreeing the scope of the strategic modelling during the PPA process."

The first strategic highways modelling scope was issued to Buckinghamshire by Aviva in April 2018. An updated modelling scope was issued to Buckinghamshire by Aviva on 11th July 2018. Meetings were held with Buckinghamshire under the terms of the Buckinghamshire PPA on the following dates, with highways design and modelling information submitted prior to each meeting.

- 4 June 2018;
- 22 June 2018; and
- 8 August 2018.

Aviva / Human+Nature undertook the following **formal public consultation** activities from May to August 2018:

- On 10 May 2018, Aviva / Human+Nature presented their vision and initial concepts to the Gomm Valley and Ashwells Liaison Group;
- On 29 June, 30 June and 1 July, Aviva / Human+Nature conducted an open, three-day public consultation event on site, presenting their emerging development proposals to the local communities;
- On 2 August 2018, Aviva / Human+Nature met with the Gomm Valley and Ashwells Liaison Group to provide an update on the development proposals following public consultation; and
- On 21 August 2018, Aviva / Human+Nature met with the Gomm Valley and Ashwells Liaison Group to undertake a 'workshop' to receive their views on the draft proposals for the site.

Aviva participated in the **Wycombe District Local Plan Examination** in the following ways:

- Submitting a Matter 3 Hearing Statement on 29 June 2018;
- Appearing at the Matter 3 Examination Hearings on 18 and 19 July 2018; and
- Submitting a Matter 7 Hearing Statement on 17 August 2018.