



Hampden Fields Action Group

12 Main Street
Weston Turville
Bucks
HP22 5RR

5 February 2019

Dear AVDC Planning Team,

18/04346/AOP LAND AT SW AYLESBURY

I am writing on behalf of this action group to **object** to this planning application. We have already identified several important issues and weaknesses in the application documents. We are continuing to work on some more detail from the extensive documentation and may well be adding further comments in a second note to you.

TRANSPORT

1) The Aylesbury Transport Strategy

This strategy is heavily referenced as providing the context for the proposed development's transport planning. Yet you will be only too aware of the criticism that the ATS has been under, notably the independent scrutiny at the the current Examination in Public of the VALP. At the public hearing 20 July 2018, the Inspector described the ATS as "rough and ready". In his Interim Findings, he points out that the current draft VALP could not be judged 'sound' because the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself, which is not the case. We have seen nothing to suggest that this has been done, so the strategy cannot be relied on to support this application.

2) Assumptions

For its baseline plan, the Transport Assessment is based on several critical assumptions, none of which can be relied upon. First, it assumes that the listed series of orbital roads will be in place (para 4.5). Second, it assumes that HS2 will go ahead (para 4.6) though this cannot even now be assured. It also states that agreement with HS2 over design is 'essential' (para 5.19). This is not only a technical question regarding the route and infrastructure design but also raises questions regarding funding.

On the question of funding, neither the Transport Assessment nor the Planning Statement appear to make any mention of how the long-term dualling of the SWLR will be funded. If it is assumed that this would be taken on by the Highways Authority, this would of course cause significant cost to the public purse.

3) Availability of information

We note that the data tables have not been included in this Assessment (8.23). This goes against the principle of transparency for public consultation. We expect these data tables to be made available as a matter of urgency.

Looking at what has been published, we take issue over three substantive points:

- a) The traffic monitoring covered in 3.3 and 3.12 was only carried out on the north of the site. Why was similar monitoring not done at the southern end, where some of the problems will occur?
- b) The trip rates used are those from the Hampden Fields application 16/00424/AOP. These are highly contested.
- c) Para 8.14 claims that the overall effect will be substantial traffic reductions at Aylesbury town centre. But Figure 8.4 shows no measurement of the Walton Street Gyratory that would support this claim.

4) Junction Analysis

The TA quotes from BCC's LTP4 that junctions are "particularly important" (para 2.29). This is, of course, true. If the Highways Authority then applies its own standard to some of the junction aspects in the application, they cannot recommend that it be permitted.

In detail, to back this up:

- a) Queues in the AM and PM peaks for 'Junction 4' (tables 8.19 and 8.20) are predicted to be so lengthy as to make the junction unworkable. Scenario 4 forecasts delays of some 20 minutes in the morning and 18 minutes in the evening for the A4010, quite impracticable for a newly designed road system.
- b) Translated into static vehicle numbers, these result in queue lengths that can accurately be described as gridlock. From one arm: 173 vehicles in the am peak, 299 in the pm peak. From another, 490 and 459. 459 vehicles nose to tail would stretch for 2.2km!

- c) The RFC ratings for this junction are correspondingly unacceptable. Of the 24 listed (am / pm/ all scenarios), no fewer than 17 (70%) are above the limit (0.9) for a working junction. Some for the B4443 and A4010 are as much as 50% higher than workable capacity.

The application itself is highly critical of the proposed junction (8.54 and 8.55). It emphasises that the design of that junction is “critical to ensure that the wider Aylesbury orbital routes proposal, which is part of the Aylesbury Transport Strategy...is deliverable.” To say that the preliminary design “requires some adjustment” from that currently proposed by BCC and HS2 is something of an understatement. Yet the design for that roundabout is now well into its third year (SEALR Business Case dates from November 2016). Once again, as for the ATS in the VALP, the Highways Authority’s capability has come into question. As a result, the Planning Authority and relevant Committee must have some doubts over whether the HA’s recommendations regarding the transport aspects of this application can be relied upon.

5) Flawed Mitigation

In spite of these obvious and serious problems, there is no mention of the SEALR roundabout problem and its resultant mitigation needs in the Mitigation section 10. We find this omission unbelievable. It renders the TA incomplete over a crucial piece of infrastructure.

PLANNING

6) Planning basis

The application’s Planning Statement is predicated on the VALP (5.4). It contains, however, an incorrect statement when it asserts that the draft VALP “has been through examination.” The draft Plan is still undergoing Examination following the public hearings last summer. It has not yet been approved and indeed the critical interim findings (August 2018) and the ongoing delay in producing a draft final report with the Major Modifications that will certainly be necessary all suggest that final approval is by no means a foregone conclusion.

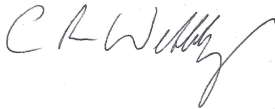
Existing saved planning policies are discounted in the application (paras 5.3 and 5.4). These include, for example, policy GP35, recently referenced in appeal 18/00007/NONDET and Planning Inspectorate report APP/J0405/W/17/3189046 yet not mentioned once in the Planning Statement. The application therefore cannot be properly considered by the Planning Authority or Committee because it is being presented before the VALP comes into operation yet does not address the requirements of the planning policies that are currently in force.

7) Internal inconsistency

The Highways component of the Planning Statement (6.82 and following) completely ignores the problems that the application's own TA has highlighted. There is no mention of the queues, SEALR junction problems and the need to negotiate changes to infrastructure with HS2. It is alarming that this should be so, when an application must be depended on to have identified all the important issues and to have proposed ways to solve them.

In summary, this application contains so many content issues and process flaws as to make it impossible to be determined. We therefore object to it. As I mentioned at the start, we may be making further comments to you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C R Webbley', written in a cursive style.

C R Webbley
Chairman, Hampden Fields Action Group