

HFAG REPRESENTATIONS ON VALP 2013-2033 PROPOSED MAIN MODIFICATIONS

The Plan as now modified presents so many transport weaknesses as to be unsound. It rests on a Transport Strategy whose evidence base is flawed, in terms of model structure and data used. The two traffic models used are not up to standard, raising severe questions both about future capacity and about funding. Data for Aylesbury has not been updated, despite being six years old, in the light of significant new road scheme proposals and local increases in proposed housing numbers.

Deliverability against the timetable for funding and construction is unrealistic. The Inspector will be aware of the planning decision, appeal and subsequent High Court judgement by Sir Duncan Ouseley in relation to Manor Oak Homes (CO/5094/2018) which centred around BCC assertions regarding deliverability of key infrastructure.

The Plan also fails to incorporate the transport potential of the Oxford-Cambridge Expressway and East-West Rail yet is assumes HS2 will go ahead and has no contingency planning should it not do so.

These main points are developed and supplemented below for the Inspector to take into account. The table shows which Main Modification we are critiquing, our representation in detail, and the Soundness criterion / criteria failed.

15 December 2019

MM REF	TOPIC	HFAG REPRESENTATION	'SOUNDNESS' CRITERION FAILED
MM008	New settlement, impact of major schemes including OX-CB Expressway	<p>1. The modified Plan has downgraded the need to take full and early account of the largest transport infrastructure project to affect the District since the building of the M40, namely the Oxford – Cambridge Expressway. No longer does the Council anticipate the need for an early review, but rather defers consideration to some “future Local Plan update”, which appears to may not even be necessary. This major strategic weakness in the modified Plan indicates the inadequacy of the Council’s thinking.</p>	<p><i>The Plan is not</i></p> <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Consistent with national policy</i>
MM022	Plan update	<p>1. (See also MM008) The Plan no longer uses evidence to indicate that a review will be needed soon after adoption. The modified statement jettisons any evidence reference and simply envisages an update at some undefined future point. As that would inevitable during the remaining 13-year life of the Plan, the modification can only mean that the Council has changed its commitment to a positive, evidence-based approach in favour of a bland, “drift and see” policy.</p>	<p><i>Not</i></p> <ul style="list-style-type: none"> • <i>Justified</i> • <i>Consistent with national policy</i>

<p>MM 031</p>	<p>“Sustainable transport vision” “...integrated, forward-looking transport options which support economic prosperity and wellbeing for residents”</p>	<ol style="list-style-type: none"> 1. The Plan lacks forward-looking strategy and vision on transport. A prime example is the lost opportunity to integrate the Oxford-Cambridge Expressway and East-West Rail into the District’s transport plans (see also MM008 and MM031). Nor are the collection of proposed link roads ‘strategic’, being a mixture of single and dual carriageway roads with maximum speeds as low as 30mph in some places. 2. Nor is the Plan sustainable as it will lead to increased traffic congestion on major Primary Public Transport Corridors and other key points around Aylesbury, particularly the Walton Street gyratory. 3. As a result, the Plan will not support economic prosperity or wellbeing as claimed. 	<p>Not</p> <ul style="list-style-type: none"> • <i>Justified</i> • <i>Effective</i>
<p>MM 035</p>	<p>D-AGT1 and SEALR</p>	<ol style="list-style-type: none"> 1. The Plan has been modified to raise housing to “at least” 1,000. This is the first of several increases in proposed local housing numbers not accompanied by traffic mitigation measures. Yet the SEALR was highlighted to the July 2018 EiP Public Hearing on Transport as “needed to solve the gyratory [problems]” 2. The modified wording replaces “provision of” by “prioritising the delivery of” the distributor road (the SEALR). This is a downgrading of the council’s commitment, at odds with BCC’s rating this road as ‘critical’. 3. It is most unlikely that this ‘priority’ road can be completed by the committed date of 2021, with the business case and planning permission process still to run 	<p>Not</p> <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i>

		<p>4. Some of the funding for the SEALR (due completion 2021) depends on developer contributions (see MM210). But the timing of these is highly questionable. First, only 12.5% of AGT-1 development is scheduled to be in place by 2023. Second, the contribution from D-AGT3 Woodlands currently (draft S106) stated as 'up to £3.6m' is not triggered until the 900th dwelling out of the planned 1000. But the 1,000 dwellings may take up to 2033 to be completed (MM048). Also, with no WebTAG model in place, there would be no possibility of funding from DfT to fill any gap.</p> <p>5. We do not accept the basis on which the Countywide Model has been created (see TPP letter accompanying this submission and numerous comments throughout this submission).</p> <p>Even if we were to accept the flawed modelling Figure 5-F in the Jacobs Countywide Model report, (Countywide Local Plan Modelling Support Phase 3 Final 160817), although partially hidden by a text box, shows significant congestion on approach roads at either end of the SEALR. The capacity of one of the terminal roundabouts has already been shown to be very sensitive. The modification to the design of the SEALR, and the excessive housing placed along it, will combine to create congestion at either end. In layperson terms, preventing traffic accessing directly along the SEALR naturally only creates congestion at either end of it on the associated adjoining roads.</p>	
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MM 041	D-AGT2 and SWLR	<ol style="list-style-type: none"> 1. The assertion that, "...the delivery of the South West Link Road [will relieve] traffic pressures in the town centre and enabling easier vehicular movement around Aylesbury" is heavily contested given the flaws in the model and therefore it has not been proven. 2. Even the Jacobs report (see above) accepts that significant mitigation will be required in the Coldharbour area, yet no mitigation is included or modelled. The requirement for updated traffic modelling is once again reinforced. 	<p>Not</p> <ul style="list-style-type: none"> • Positively prepared • Justified
MM 044	Build profile for Woodlands element of D-AGT3	<ol style="list-style-type: none"> 1. The modified text states that Woodland homes are projected to be delivered some time from 2021. AVDC's Strategic Development Management Committee were advised that no residential land would be brought forward in the first 5 years (Officer report 16/01040/AOP, para 9.33, October 2017), on which basis they passed a resolution to defer and delegate planning permission. The 2021 Plan date for possible housing delivery cannot therefore be correct in the light of the SDMC decision. As the Plan cannot be delivered, AVDC will be forced to find new sites at short notice or be at the mercy of opportunistic applications. 2. Uncertainty expressed by a previous inspector and supported by the Ouseley Manor Oak judgement is relevant across the whole Transport Strategy (see comment below on MM202 and MM203) but we draw the Inspector's attention to it in this section as well. The uncertain delivery of Woodlands (see MM048 below) means that delivery of the ELR(S) and the SEALR are uncertain despite BCC's assertions. 	<p>Not</p> <ul style="list-style-type: none"> • Effective

MM 048	D-AGT3 including Woodlands and ELR(S)	<ol style="list-style-type: none"> 1. (See comment 1 against MM044). 2. This raises serious questions about the timing of developer contributions to the £23.6m costs of building the ELR(S) (MM210). 3. The financial viability of this scheme was questioned during the planning application process, with an official report stating that it was ‘challenged’ (i.e., unviable). No money was assigned to build the crossing over the Grand Union Canal, and the detailed plans for that crossing were withdrawn from the application that went before the relevant planning committee. The original estimate of costs for the ELR(S) without the canal bridge was £40m, reduced to £28m but only at risk to public money. The modified VALP now includes the bridge within a £38m cost. This means that the risk-laden lower figure of £28m is being adopted, which is a highly questionable approach and unsound because it does not meet objectively assessed requirements and cannot be delivered. 	Not <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Effective</i>
MM 055	D-AGT4	<ol style="list-style-type: none"> 1. The modification to the Plan increases the proposed housing numbers by 7% (from ‘around 3111’ to ‘at least 3358’). Yet there is no evidence of any updated transport assessment that gives confidence in the network’s capacity to absorb this increase. (It is worth noting that the existing Transport Assessment for the planning application for Hampden Fields was based on a still lower housing figure (“up to 3,000”). As the Inspector will be aware, a 10% uplift of traffic in an already congested space is of serious concern. 2. The proposed Southern Link Road through this site, rated as ‘critical’ and costing >£17m (MM210) is not mentioned anywhere at all in this section. Such a lack of ‘joined up thinking’ is a significant error in the modified Plan. 	Not <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i>

MM 088	D-HAL003	<ol style="list-style-type: none"> 1. Although the narrative of the Jacobs Report (Countywide Local Plan Modelling Support Phase 3 Final 160817) claims that 1,000 houses at Halton are included, Figure 3-A in the report shows virtually no housing for Halton. As a result, the Inspector can have no confidence that this part of the modified Plan with major impact has been properly considered. 2. Paragraph 5.2.1.6 in that same report shows significant travel time increases in and around Wendover. The acknowledged limitations in the Countywide model mean that these have most likely been underestimated. Once again, no mitigation is offered or been modelled in Countywide model runs. 3. This is also relevant as the A413 from this site into Aylesbury is a Priority Congestion Management Corridor, which threatens the modified Plan aim of safeguarding “a network of cycling and walking links to and from Aylesbury Town...” (MM088 para e) 	<p>Not</p> <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i> • <i>Consistent with national policy</i>
MM 202 and MM 203	Aylesbury Transport Strategy (ATS)	<ol style="list-style-type: none"> 1. The Inspector himself pointed out in his Interim Findings that the ATS was not previously part of the VALP. Now that it has been included in the modified Plan, it becomes open to challenge in this consultation. 2. See also the current letter from consultants TPP who were present at the July 2018 public hearing and who have reviewed this modified Plan in depth and detail. 3. The modified text has significantly strengthened the claims made for this strategy and its underpinning models. “...is intended to address” current issues has become “addresses”. (MM202) Yet the modelling does not justify that claim because the whole strategy for roads around Aylesbury is based on inadequate work and evidence. The Aylesbury Transport Model does not comply with the DfT Web-TAG standard and 	<p>Not</p> <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i> • <i>Consistent with national policy</i>

		<p>has only been validated for a small section of Aylesbury (the Eastern section) yet is now put forward as sufficient on which to base this Plan. Therefore, it cannot be regarded as being positively prepared.</p> <p>4. The Countywide model is also not validated. In fact, it comes up significantly short of validation in key areas (see TPP letter and also the submission from Milton Keynes Council) It is disappointing that in their narrative BCC continue to rely on the line that it is “based on WebTAG principles”. This statement does not recognise the flaws in the model and prevents them embracing an update that could have been achieved and led to a positively prepared Transport plan.</p> <p>5. The Countywide Model is even criticised by the Council’s own consultants AECOM, “...it is unlikely that the model can be used to accurately identify existing and future transport issues in its current form.” (AECOM Aylesbury Transport Strategy Technical Note Stage 1, April 2016)</p> <p>6. Given the critical importance of an effective transport system to the major settlement in the Vale and therefore to the soundness of the entire Plan, if there is any doubt over these issues, the Enquiry should hold a further public hearing so that the Inspector can base his judgment on the fullest and up-to-date information.</p> <p>7. In brief, the ATS:</p> <p style="padding-left: 40px;">a. Is based on below-standard modelling at County and District level, with the Aylesbury element only validated for one small part .</p>	
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MM 205	Buckingham TS	1. The flaws in the County Model (see MM202 and 203) apply to the Buckingham Transport Strategy.	Not <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i> • <i>Consistent with national policy</i>
MM 206	Council aim to achieve transport strategy	1. The strategy is fundamentally flawed and so this modified aim cannot be achieved.	Not <ul style="list-style-type: none"> • <i>Justified</i> • <i>Effective</i>
MM 208	Local transport schemes	1. Simply rating elements of an insecure strategy and plan as 'critical' does not guarantee that they are sound nor provide a reasonable chance that they can be delivered.	Not <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i>
MM 209	HS2 and Stoke A4010 alignment	1. As this alignment is 'critical' to the proposed strategy, it cannot be judged to be sound while there is uncertainty over HS2. 2. No decision as to the soundness of the plan can be delivered until a final decision over HS2 is taken. If HS2 is not delivered, then HS2 have confirmed that the realignment will not be paid for. 3. The impact of the realignment not taking place is of utmost significance. The whole of the strategy falls because people could not access the link road system unless they entered through Stoke Mandeville Village. As it is part of the Wycombe Local Plan the Inspector may not be aware of plans to build 3,000 houses just three 3 miles to the south of this point. Any journeys north from that development must access the Aylesbury network.	Not <ul style="list-style-type: none"> • <i>Justified</i> • <i>Effective</i> • <i>Consistent with national policy</i>

<p>MM 210</p>	<p>Policy T3 including transport schemes</p>	<ol style="list-style-type: none"> 1. The modified Plan references the Buckinghamshire County Model and the Aylesbury Transport Study as its evidence base for many schemes. Both the Model and the Study are unsound. The Countywide Model has been criticised by BCC’s own consultants AECOM as unlikely to be able to be used to accurately identify existing and future transport issues. It falls short of DfT’s WebTAG standards. The Model is based on synthetic data with few or no observed data for vehicle origins and destinations. <p>The Aylesbury Transport Model has only been validated for one section of the proposed road system (the ELR). Origin and destination surveys have been conducted on only two of the six A-road entry and exit points to the town, not the full ‘cordon survey’ that good practice demands.</p> <p>Therefore, neither of the key components of the modified Plan’s transport evidence base provide objectively-assessed requirements nor proportionate evidence.</p> <ol style="list-style-type: none"> 2. These issues also mean that the strategy already lacks “integrity” (para 4), so logically planning permission cannot be given for development affecting the listed schemes. 3. The weakness in the proposed strategy appears to have been recognised by national government. A confident BCC £200m bid to the Housing Infrastructure Fund for these ‘critical’ roads was expected to have succeeded by May 2019 but has still not done so six months later. 	<p>Not</p> <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i> • <i>Effective</i> • <i>Consistent with national policy</i>
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		<p>4. On specific schemes included in the modified Plan:</p> <ul style="list-style-type: none"> a. The wide variation in costing ranges suggests that the evidence for them is highly uncertain (Column 4). Some figures appear to have been plucked out of the air (“£2m-£16m” for Royal Bucks Hospital scheme, for example, or “£40m” for bridge improvements) and others present a most unconvincing level of accuracy (“£23,550,000” for the SEALR). b. The NEALR is stated to be funded by the Ox-CB Expressway, yet the modified Plan has inconsistently withdrawn the previous statement of Council support for that scheme, reducing support only to “local schemes” (Policy T3) c. The Stoke Mandeville Realignment has no costings, is dependent on HS2 and is stated to be completed by 2021. See also MM209 for the criticality of this link. d. For SEALR, please see comments on MM 035 above. e. The Western Link cannot obtain DfT funding with a traffic model that does not meet DfT required standards. 	
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MM 212	T4 policy	1. Given the weakness of the modelling and evidence base, the modified statement regarding evidence of sufficient capacity is impossible to justify or achieve.	Not <ul style="list-style-type: none"> • <i>Positively prepared</i> • <i>Justified</i>
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See also:

1. HFAG covering letter for these representations, 15 December 2019
2. TPP letter 'Aylesbury Vale District Council Local Plan Examination Main Modifications Transport' December 2019

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