

Mr Phil Yerby



Inspector Paul Clark BA MA MRTPI
c/o Louise St John Howe
Programme Officer
Via email to localplanconsult@aylesburyvaledc.co.uk

Dear Mr Clark,

Aylesbury Vale District Council Local Plan Examination Main Modifications

I am a former Aylesbury Vale District Council (AVDC) cabinet member and local District Councillor for Stoke Mandeville, Weston Turville and Stoke Mandeville. I founded the Hampden Fields Action Group in 2011 and continue to be an active member (I fully support the HFAG submission to you). As such I have taken a very active interest in the development of the various iterations of Aylesbury Plan for the past ten years as far back as the South East Plan which was made defunct in 2010. I came before you during your 2018 public hearings into the VALP regarding AGT3 and the Transport Strategy.

I would like to make the following points in consideration of the Main Modifications proposed by AVDC which I hope will assist in drawing together some key elements.

Countywide Model

This model has been significantly criticised from at least five different independent sources. Those independent assessments have been made by:

1. Transport Planning Practice, an Independent Transport Consultancy with expertise in modelling, especially Mr David Thompson who appeared before you on 20th July 2018 and has revisited the VALP since the publication of the Main Modifications;
2. Mouchel Ltd on behalf of Highways England in correspondence to BCC obtained under Freedom of Information (attached to this letter);
3. Milton Keynes Council in a letter to the Inspector dated 16th December regarding the VALP main modifications (obtained from Milton Keynes public records);
4. Aecom itself, BCC's own transport consultants in correspondence to BCC and contained within supporting VALP documentation
5. Dr Cullen Riley in documentation on behalf of La Salle LLP and to the public hearing meeting of 20th July 2018

I will not repeat those very clear and consistent criticisms here but it must now be clear that the model is not suitable for the purposes it is being used for. We all understand that in some circumstances these limitations may be overcome and a non webTAG compliant model can be used for some Local Plans. However, in the case of the VALP, where such significant infrastructure requirements are proposed, the approach is unsound. NPPG Guidance "Transport Evidence Bases in Plan Making" published 13th March 2015 makes it very clear on this specific point:

"How is the WebTAG approach useful in the transport assessment of the Local Plan?"

An assessment should adopt the principles of WebTAG by assessing the potential impacts of development within the framework of WebTAG objectives. For most Local Plan assessments the full methodology recommended will not be appropriate. The Highways Agency's Project Appraisal Report System may provide some useful guidance on methods more appropriate in these cases. Assessments involving major new transport infrastructure should, however, employ the methods set out in WebTAG."

It is common ground that the VALP contains "major new transport infrastructure" including roads that have been deemed "essential" in order to be built on Level 3 floodplain. The argument that the Countywide Model is "based on WebTAG principles" fundamentally fails to acknowledge this guidance when taken as a whole, the significant and vast underperformance of this model within the Local Market Validation Report and the margin of non-compliance is significant i.e. screenline and journey time validation among many others.

In addition, it is not in dispute that the base model is now six years out of date. Aylesbury has undergone significant underlying traffic growth since that time and the model underperforms in key areas where major development is proposed, e.g. Halton/Wendover.

The model needs to be updated, WebTAG compliance achieved and new model runs presented to the public and the Inspector.

Aylesbury Transport Model (ATM)

In some circumstances, weaknesses in the broad countywide models may be overcome by more local, WebTAG compliant models which focus on a specific area or town. In such a situation, the more detailed local model could be relied on to 'bridge gaps' in the broader model. In the case of the VALP no such models exist. The Aylesbury Transport Model has only been validated for one small section of the town (the Eastern section) yet it is being used to justify the Aylesbury Transport strategy and significant housing growth not only around the town. Such an approach cannot be justified.

The Inspector will be aware that a WebTAG compliant model must be in place before any public money will be invested. That means the ATM must be in the

process of being updated or certainly should be. Why have any new or updated model runs/outputs not been released to the public and the Inspector?

Aylesbury Transport Strategy (ATS)

The Aylesbury Transport Strategy has now become part of the VALP. There is no evidence that is before the public or the inspector that the ATS can be justified. The premise of cross-town commuting is assumed in the ATS but no supporting evidence exists beyond one Origin and Destinations survey from 2014. This 'myth' has been passed on and amplified by BCC and AVDC in various documents as far back as the 2001 Aylesbury Land Use and Transport Strategy (ALUTS). No "reasonable alternative" has been considered from the outset.

The Inspector will note that it appears the VALP no longer relies on Bucks County Council's (BCC) flagship Transport policy **Local Transport Plan 4 (LTP4)**. At paragraph 46 of the interim findings the Inspector stated "The Buckinghamshire Local Transport Plan 4 is not even part of the evidence base for VALP". In the main modifications document all reference to LTP4 has been removed. It appears BCC have no confidence in a document relied on previously to support the Aylesbury Transport Strategy and VALP.

At the Public Hearing on 20th July 2018 the BCC representative reassured the hearing that the "latest data shows that it [cross town commuting] is significant". I noted the use of the present tense to suggest that such data was already at an advanced stage of preparedness – why else would the BCC representative have made such a claim? Nearly 18 months on, again I cannot find any updates released to the public or to the Inspector.

Thus, there remains no documented evidence before the Inspector to demonstrate that the Aylesbury Transport Strategy has been positively prepared or will be effective. Additionally, there appears not to have been any consideration of reasonable alternatives, which means that the plan cannot be justified.

Road Alignments

At paragraph 50 of the Inspector's Interim findings he states:

"If, in the modifications which the Council should prepare in response to my recommendations, it is decided to show what could be interpreted as a precise alignment, the Council will need to bear in mind NPPF paragraph 152. This advises that significant impacts on any of the dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued."

I cannot be sure what the Council's position is regarding this point. It appears not to have been addressed. It is clear from specific planning applications relating to AGT3 (AVDC reference 16/1040/AOP) and AGT4 (AVDC ref 16/0424/AOP) that for the ELR(S) and the Southern Link Road the road alignments in VALP are those already approved at Committee by the Council as

exact alignments. Reasonable alternatives, including those that would have a lesser impact on the flood plain, have not been considered. (The inspector may want to refer back to Hampden Fields Action Group's evidence on what they and I regard as inadequate sequential testing).

Deliverability

Like others I remain concerned about the 'book end' approach to costing of major infrastructure projects which plan to be delivered in such a short timescale. Even if we were to accept the Countywide model in its entirety we know from the model runs that all the infrastructure contained in Run 2 is required for what they believe to be adequate mitigation. What is clear is that if any part of that infrastructure fails to come forward the whole strategy fails.

Of particular concern are the inconsistencies in what is claimed in delivery times for critical infrastructure which directly conflicts with already published draft s106 documents for both AGT4 (specifically planning app 16/00424) and AGT3 (specifically planning app 16/01040). Detail is within the submission from HFAG.

Both North East Aylesbury Link Road (NEALR) and the Western Link Road (WLR) are now claimed to be deliverable within the plan period when previously they were not. According to page 92 of the Main Modifications document the NEALR is to be funded by the "Oxford to Cambridge Expressway". This statement appears to lack any publicly documented evidential base given the preferred route alignment announced by the Government. Whilst it is stated that the Western Link Road is "likely to require grants e.g. DfT."

BCC have applied for a Housing Infrastructure Fund grant which, according to the BCC Cabinet papers from February 2019, they anticipated getting approval for in June 2019 but no such funding has been announced, possibly because of the lack of a webTAG compliant basis for the request.

Even in the most optimistic case that the grant is given in full it remains unclear that the infrastructure mitigation costs can be covered, let alone delivered on time. Accordingly this section of the plan is not positively prepared.

What must be done to make the VALP sound?

1. A webTAG compliant model must be developed using 2019 (or 2020) as the base year including up to date actual traffic counts. It must accurately reflect the current situation on the Aylesbury network as it is required to by NPPG. It must be fully validated given the infrastructure requirements of the plan.
2. New model runs must be completed and made available to the public for scrutiny.
3. Alternative road infrastructure should be considered within the updated model runs.
4. Alternative alignments that have a lesser impact on the floodplain should also be considered.

5. It naturally follows that the Aylesbury Transport Strategy should be revisited in line with points 1-4 above.
6. Funding and timing of key infrastructure needs to be demonstrated to be deliverable.

I hope this assists the Inspector with his examination. I am very happy to provide more information should he wish and am willing to attend any Public hearing should he feel one is necessary.

Yours sincerely

Phil Yerby
16th December 2019

Attachments:

Highways England correspondence with BCC including Mouchel comments on the Wycombe District Plan and Countywide Model.