

**WEEDON PARISH COUNCIL**  
**CLERK TO THE COUNCIL MRS RUTH MILLARD**

Claire Harrison  
Development Management  
The Gateway Gatehouse Road  
Aylesbury  
Bucks  
HP19 8FF

29<sup>th</sup> January 2013

Dear Claire

**Ref: Weedon Parish Council's response to planning application:**  
**13/03534/AOP Land East of A413 Buckingham Road and Watermead**

At the Weedon Parish Council meeting on Wednesday 15<sup>th</sup> January, the Council resolved to object to this planning application on broadly the same grounds as previously put forward in respect of application 13/00391/AOP. Prior to this resolution, members of the public who attended voted unanimously to urge the Council to take this course.

Weedon Parish Council is disappointed that the new application, while admittedly submitting additional supporting information, does not make ANY changes to the masterplan in respect of proposed housing layout, design, density or height profile, nor to the route, junctions or proximity to residential dwellings and school of the proposed main link road.

Our comments are as follows:

1. Approval of the proposals would be **premature** to the provisions of a new Vale of Aylesbury Plan (VAP) and to the results of the Planning Appeal in respect of the three proposed developments at Fleet Marston, Hampden Fields and Land North of Weedon Hill. The fate of the latest proposed VAP is currently unclear, following the National Planning Inspector's recent negative comments, and the results of the joint appeal are not expected before December 2014.
2. This site was not included as a potential development area in the proposed VAP, and the district housing target contained in the VAP of 13,500 new homes over the period 2011-2031 can be covered by sites already committed. Even if the housing target is subsequently revised, following the Inspector's comments on the VAP, the impact of the additional housing from any of the three appealed MDAs that are allowed cannot be taken into account until the results of the joint appeal are known.
3. Considering the application against the National Planning Policy Framework, we believe the application does not represent sustainable development.
4. Even if it is held to be sustainable, we consider that the application should be refused on the NPPF grounds that the adverse impacts of its approval would significantly and demonstrably outweigh the benefits.
5. There is still a question over whether the development is deliverable, as a parcel of land right in the centre of the project area is not included in the application. Confusingly, most of the supporting documents do assume this land to be part of the project, talking about 1,700 homes, instead of the 1,560 in the title of the application, which excludes the 140 homes on the land.

For ease of reference we have arranged our further comments on particular impacts under the chapter headings contained in the Environmental Statement, although our numbering does not correspond to the chapter numbers.

# WEEDON PARISH COUNCIL

## CLERK TO THE COUNCIL MRS RUTH MILLARD

### 6. Socio-Economic Impacts

- 6.1 The application fails sustainability criteria in the very important aspect of employment opportunities within the development. There are very few estimated long-term jobs being created – just 140, and these come from the school/nursery (50) and the small retail outlets. This is very far short of the ideal “one job per dwelling” target, which would require 1,700 jobs!
- 6.2 No other large employers are nearby, and there is limited access except through use of a private car to employment sites in other parts of the town. Provision of bus services will almost certainly only give easy access to the town centre, if the pattern of other developments is repeated. The distance from the town centre would make walking an unattractive option.
- 6.3 We are concerned at the impact on Watermead and Bierton, which are flourishing communities in their own right. The plans do not respect the natural boundaries of these villages, depriving them of sufficient green space buffer, while not encouraging integration with the new development.
- 6.4 Oddly, the development projects an isolated feeling, despite its extremely close abutment to the neighbouring settlements. Its only links with Watermead are two existing public footpaths – there are no connecting roads or walking/cycling routes proposed. Bierton will be linked by just one “greenway”.
- 6.5 We are concerned at the impact on vital services, particularly schools, hospitals and primary healthcare, of yet more development on this side of Aylesbury. While the MDA allows for a new primary school, community centre, doctor’s surgery and recreation areas, we are not sure how the impact on secondary school places at the grammar schools, the local upper schools, and Stoke Mandeville Hospital could be managed.

### 7. Ecology and Nature Conservation

We cannot agree with the applicant’s conclusion in ES-C6 paragraph 6.14 that the overall long-term ecology and nature conservation effect of the project would be “minor to moderate beneficial”. However, the additional data from the July 2013 Field Survey appears to support the claim that there would be no major adverse overall impact on wildlife or trees and plants, due to the creation of substantial green infrastructure.

### 8. Water and drainage

- 8.1 We note that the Environment Agency will apparently not maintain its previous objection to the project, following submission of further information by the applicant to support the Flood Risk Assessment. However, we are still concerned that the proposed route of the Main Link Road (MLR) takes it through an area of Zone 3 highest flood risk at its north-western exit from the development to cross the River Thame and join the A413. Building essential infrastructure in this highest-flood-risk area is surely not to be considered sustainable?

- 8.2 We draw your attention to the conditions of flood seen in the recent wet weather (December 2013/January 2014), in the flood-plain of the River Thame on the project site and to either side of it. There has been substantial standing water around the river.

A little further along the River Thame to the south, between the edge of Aylesbury and Buckingham Park, the flood-plain has a footpath/cycle path running through it, which provides pedestrian and cycle access to Aylesbury from Buckingham Park. The whole area, including the path, has been under inches of water on several occasions, for days at a time, making it completely unuseable.

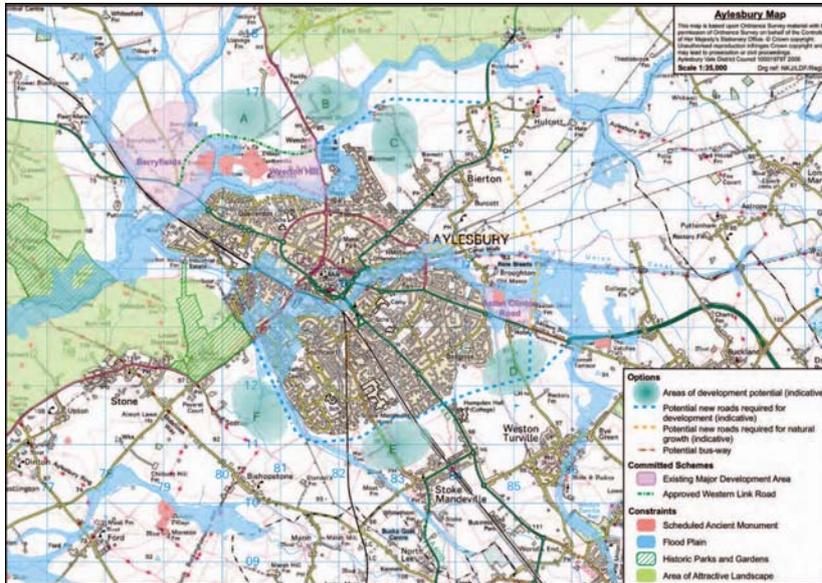
Building a major road through a similar section of the flood-plain would seem to present significant difficulties if the road were not to be subject to the same potential hazard.

# WEEDON PARISH COUNCIL

CLERK TO THE COUNCIL MRS RUTH MILLARD

## 9. Landscape and Visual Issues

This aspect is still one of the most concerning to us. We refer back to the map produced as part of the AVLDF process in June 06, showing the potential development areas around Aylesbury, and the surrounding landscape designations.



9.1 The application site forms part of the Aylesbury North East “Site C” identified in the AVDC Core Strategy documents of 2010/11. This area was found by the Inspector examining the Core Strategy to be the “most sensitive” in landscape terms.

9.2 Views from the Area of Attractive Landscape to the north of the River Thames, and from Conservation Areas in Weedon and Aston Abbots would be compromised by the development.

The series of photographs from “selected” viewpoints submitted as part of the Environmental Statement is disappointingly no different from the previous application. We continue to find them extremely unhelpful. They give only the view NOW, with diagrammatic outlines representing the extent of the development. They do not superimpose any montage to give an impression of how the views would change if the development were to go ahead. With buildings of 3 stories, up to 12m in height, a rolling country landscape would become a significantly intrusive urban area.

9.3 As Weedon and Aston Abbots are both on the ridge of higher ground inside the Area of Attractive Landscape, the negative impact on public views from those villages and from several public footpaths looking towards Aylesbury would be further accentuated. Looking DOWN on it from the ridge means no amount of hedgerow-height mitigation could hide the development from these viewpoints.

9.4 We are also concerned at the potential for increased light pollution stretching into the countryside from such a substantial development.

## 10. Agriculture and Soil Resources

Almost 50% of the agricultural land contained in the application site is considered to be “best and most versatile”, with 15.4% Grade 2 and 30.5% Grade 3a. Only 4.9% of the land is less than Grade 3b. Thus this development would cause the loss of 55.6 hectares of best and most versatile agricultural land, plus 59.6 hectares of moderate quality (3b) land, contrary to sustainability criteria.

# WEEDON PARISH COUNCIL

## CLERK TO THE COUNCIL MRS RUTH MILLARD

### 11. Historic Environment

11.1 The area is of significant archaeological interest. With many finds already in the project area and nearby, the applicant's own desk study identified a "high" potential for late prehistoric, Roman, Saxon and medieval remains.

11.2 We were therefore most interested to read the results of the archaeological trenching exercise carried out by Oxford Archaeology in summer 2013. However, only 35 of the originally proposed 60 trenches were opened, meaning that 42% of the locations remained un-surveyed.

We are not sure of any underlying reason why so many of the proposed trenches were not dug, beyond the bald statement in the Oxford Archaeology Evaluation Report p.5 that:

*"Thirty-five of the originally proposed sixty trenches were opened, the remainder being abandoned, as permission was not forthcoming from the tenant farmer."*

**However, the very fact that such a significant proportion (almost half!) of the trenching exercise was not carried out inevitably suggests to us that one or more parties in favour of the development is concerned that these may indeed be potential locations for important finds.**

Figure 3 of the Evaluation Report shows the trench locations, both completed and not completed, and is marked with identification of probable and possible archaeological remains. The area of the uncompleted trenches is right in the heart of where the highest-density housing is planned. The Main Link Road (MLR) also runs through the area.

The area of uncompleted trenches features a significant number of marks identifying "possible archaeology" in the form of "positive anomalies – possible cut features of archaeological origin".

We strongly suggest that unless and until the trenching exercise can be completed, no planning permission should be granted, in order to avoid destroying potentially important remains.

As the applicants themselves state in paragraph ES-C9 5.2 (our italics and bold type):

*"There are a number of non-designated heritage assets recorded within the Project Area that will be affected by the construction of the proposed development leading to their partial or total destruction. There is also potential for as yet unrecorded prehistoric, Roman, Saxon and medieval remains within the Project Area. **Should such remains be present, the construction of the Project would lead to their partial or total destruction.**"*

### 12. Traffic, Transport and Access

12.1 While in principle we welcome road improvements which can reduce the pressure on the A413 junctions, we are still not convinced even by the new modelling presented that this development would necessarily do that.

12.2 As recognised in the ES, even if the development did have a positive traffic effect on the A413, the A418 junctions, particularly the Broughton Road roundabout, would be adversely impacted.

12.3 We are not convinced of some of the assumptions used in the modelling, and still have reservations over other aspects of the transport assessment.

For instance, are the trip rates used appropriate for the type of development, its location in relation to the centre of Aylesbury, the mix of housing, the other transport alternatives, and the overall transport infrastructure in 2021?

At one point the report suggests that trip rates have been calculated using Elmhurst as a model. We doubt that this is a valid comparative situation, being substantially closer to the town centre, and having a much older population than would be expected in a new development.

# WEEDON PARISH COUNCIL

## CLERK TO THE COUNCIL MRS RUTH MILLARD

12.4 The Main Link Road through the centre of the development is trying to be all things to all people. Is it a link road, or is it a main high street thoroughfare for the development?

The Design & Access Statement describes it as a single-carriageway road of maximum 7.3m width, with provision for pedestrians and cyclists, as well as frequent bus stops. Properties on the MLR would have “minimal” frontages. This “high street” style is incompatible with a strategic link road.

12.5 It is credible that the proposed junction with the Western Link Road roundabout on the A413 would operate smoothly and well within capacity. The same cannot be said of the other end of the MLR – a traffic-light-controlled junction on to the A418 close to two other roundabouts, one of which is on the main Aylesbury ring road.

Regardless of the modelling that has been carried out, we predict the A418 junction of the MLR suffering the same fate as the Watermead/Buckingham Park/A413 junction, that is, its usage would quickly exceed capacity. This would then have a knock-on effect on the A418/ring road roundabout. We strongly doubt that partial signalisation of that roundabout would mitigate the problems.

12.5 We believe the MLR as currently proposed would very soon be recognised by through-traffic coming from Buckingham on the A413 or Berryfields on the Western Link Road (WLR) as inadequate due to its “high street” nature, and the bottleneck of its junction with the A418.

The purported positive impact of the development on the A413 junctions (showing a small reduction in queueing) is negated if the significant numbers of modelled vehicles which are shown as using the MLR instead of continuing from the WLR down the A413 in fact do not use the MLR due to its inadequacy.

Only a very small change in the assumed numbers of vehicle movements would actually show a worsening of conditions at all three of the most stressed A413 junctions – Watermead signals, Oliffe Road roundabout and Horse and Jockey signals. In the given modelling, the improvements to these junctions are relatively small, and therefore very susceptible to changed assumptions.

12.7 We have looked at a specific example of this. The behaviour of traffic at the A413/WLR roundabout determines to a large degree the number of vehicles at the other three A413 junctions. One set of figures shown in the report is as follows:

**Behaviour of traffic (AM peak) coming from WLR at A413/WLR roundabout from flow plans Appendix F**

	Do Minimum 2021	With development 2021
From WLR turn north A413	167	127
From WLR across into MLR	n/a	308
From WLR turn south A413	677	436
TOTAL from WLR	844	871

With the lack of employment facilities, minimal retail, and only a primary school (which presumably takes predominantly children from the development itself), it is to be assumed that the vast majority of the 308 vehicles crossing into the MLR are intending to use this road as a continuation of their route round Aylesbury. If even a small percentage in the end do not make this choice, and use the A413 and Elmhurst Road instead, the traffic flows at the A413 junctions could worsen due to the overall increased traffic from the development rather than improve as the report indicates.

12.8 A further question on this set of figures is why the existence of the new development and MLR would cause 40 fewer vehicles to turn NORTH on the A413 when coming from the WLR. We can see no logical reason for this. Another example, we fear, of doubtful assumptions leading to modelling which then results in the outcome the applicants seek.

**WEEDON PARISH COUNCIL**  
**CLERK TO THE COUNCIL MRS RUTH MILLARD**

13. Noise

We have concerns about the traffic noise level on the new development for homes and the school which have frontages very close to the Main Link Road. As noted in 12.4 above, the properties on the MLR are to have “minimal” frontages, and this road is intended to carry much through traffic to ease conditions on the A413 and A418.

The applicant’s preliminary study shows a noise level in a “façade house” of the MLR to be 62.8 dB in daytime and 60.6 dB at night. In terms of the NEC category boundaries as laid down by PPG24, these levels are on the boundary between B and C in daytime, and well into category C at night. We quote from the PPG24 category table reproduced as the applicant’s Table 13.5:

*NEC Level C: Planning permission should not normally be granted. Where it is considered that permission should be given, for instance because there are no quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.*

Mitigation of “standard thermal double glazing” is proposed, but if windows are opened, this negates the mitigation, and we are not convinced by 5.12 and 5.13 in Chapter C13 that this can be achieved satisfactorily.

14. Air Quality

14.1 The data on air quality concentrates heavily on “receptors” along the A413, A418 and Elmhurst Road, and unsurprisingly concludes that there would be a slight beneficial effect on air quality at those locations if the development went ahead (due to the reduction in traffic).

14.2 We note that the only assessed receptors actually in the new development are (9) at the north-east corner and (10) at the south-east corner, ie. at the very edges of the housing and well away from the MLR. As the main concern would naturally be for air quality along the roads, particularly the MLR, this is a major omission. We suspect that air quality around the MLR would be at the lower bounds of acceptability due to the substantial through traffic which is forecast.

Summary

There are many areas even in this expanded environmental statement in which the applicant’s modelling assumptions, data and conclusions are still inadequate or misleading.

This is an unnecessary and unsustainable development which would cause harm to the natural environment in a particularly sensitive and beautiful section of the environs of Aylesbury, potentially destroy important heritage assets, and add to traffic chaos within the town. The design and route of the MLR within the development is ill-conceived – running through a high-flood-risk area, and with residential and school buildings too close to a road which is also to carry heavy and sustained through traffic.

We again urge AVDC to refuse planning permission for this development.

Yours sincerely

*Ruth Millard*

Weedon Parish Council