

WEEDON PARISH COUNCIL

CLERK TO THE COUNCIL MRS RUTH MILLARD

For the attention of Claire Harrison
Development management
The Gateway Gatehouse Road
Aylesbury
Bucks
HP19 8FF

11th April 2013

Dear Claire,

Ref: Weedon Parish Council's response to planning application:
13/00391/AOP Land East of A413 Buckingham Road and Watermead

At the Weedon Parish Council meeting on Wednesday 20th March 2013, the Council resolved to **object to this planning application**. Prior to this resolution, members of the public who attended voted unanimously to urge the Council to take this course.

Our comments are as follows:

1. Approval of the proposals would be premature to the provisions of the emerging Vale of Aylesbury Plan (VAP). This site is not included as a potential development area in the emerging plan, and the VAP district housing target of 13,500 new homes over the period 2011-2031 can be covered by sites already committed or in the process of approval. Therefore 1,560 new homes on this site would be in direct conflict with the provisions of the new plan, providing additional housing which would be excess to requirements.
2. Considering the application against the National Planning Policy Framework, we believe the application does not represent sustainable development. 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.
3. There is 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.

4. Socio-Economic Impacts

- 4.1 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!
- 4.2 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.
- 4.3 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.

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4.4 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”.

4.5 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.

5. Ecology and Nature Conservation

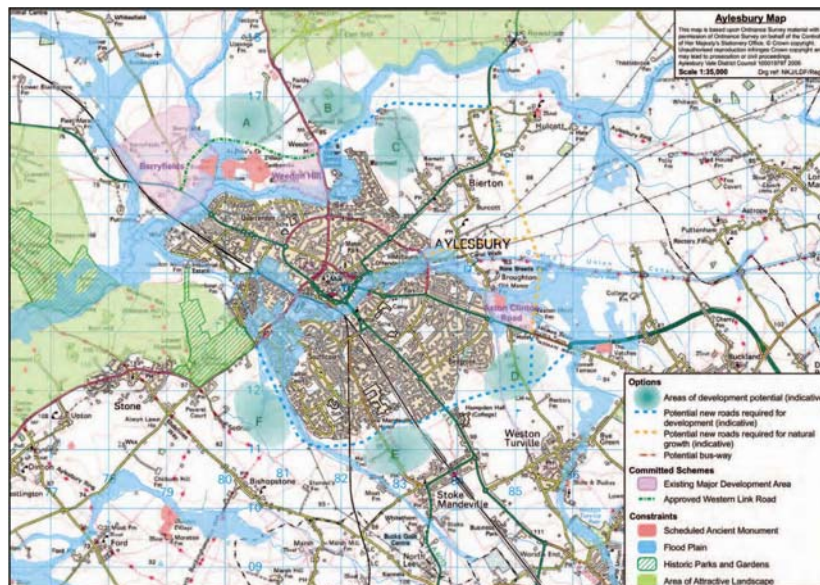
We note that AVDC’s Biodiversity Officer has found the surveys undertaken in respect of certain birds, bats, badgers and great crested newts insufficient and out of date. We would echo his call for more detailed up-to-date surveys.

6. Water and drainage

We are 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 Thames and join the A413. Building essential infrastructure in this highest-flood-risk area is surely not to be considered sustainable?

7. Landscape and Visual Issues

It is helpful to 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:



7.1 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.

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

The series of photographs from “selected” viewpoints submitted as part of the Environmental Statement we found 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 up to 12m height and buildings of 3 stories, a rolling country landscape would become a significantly intrusive urban area.

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7.3 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 the villages and from several public footpaths looking towards Aylesbury is further accentuated. Looking DOWN on it from the ridge means no amount of hedgerow-height mitigation can hide the development from these viewpoints.

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

8. 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.

9. Historic Environment

9.1. The area is of significant archaeological interest. With many finds already in the project area and nearby, the applicant’s own desk study identifies a “high” potential for late prehistoric, Roman, Saxon and medieval remains.

9.2. Ancient hedgerows and historic field systems would be destroyed, and there would be high-density urban building over these important heritage assets.

10. Traffic, Transport and Access

While in principle we welcome road improvements which can reduce the pressure on the A413 junctions, we are not convinced from the modelling presented that this development would necessarily do that; or even if it did have a positive effect on the A413, that it would not cause excess queueing and over-capacity at the A418 junctions at peak time instead.

We have some questions over the assumptions used in the modelling, as well as reservations over other aspects of the transport impacts.

10.1 Modelling assumptions

10.1.1 Although there is a brief note in the Environmental Statement (Transport Assessment ES4, Appendix C) that “the 2021 Do-Minimum modelling scenario has incorporated the effects of committed developments including the Land East of Aylesbury development”, we are not totally confident that that has in fact been done, as Appendix B of the same document does not list that development in its detailed chart of “Do-Minimum Development Assumptions”.

10.1.2 Appendix C also gives Trip Rate Assumptions for what are called the “North East SDA Development scenarios” (clearly at least part of this report has been re-used from a previous application). These use a percentage of affordable housing of 20% - not the now normally required 35% - to generate the trip rates for the models.

In addition, the same trip rate assumption table shows the split of housing to be 1,250 houses and 450 flats. The number of flats is not mentioned in the Design and Access Statement at all: on page 60, it states, “Homes will be based on 1-5 bedroom properties and this should include bungalows, terraces, semi-detached and detached houses with private garden space and parking provision.” As the trip rate for flats is less than houses, if there are to be significantly fewer flats than 450, this leads to an underestimate of the number of trips.

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Using the given trip rate assumptions for the different types of housing, but applying this to the housing mix which is proposed in the application, leads to an increase in trips of **40 per day**. While this is not in itself a great increase, we are worried if ANY incorrect assumptions are being used in the modelling, as this throws doubt on the conclusions drawn.

Number of trips as shown in report Appendix C, using assumptions 20% Affordable and 450 flats

House type	Housing mix per Jacobs Appendix C	Trip rate total am	Gives number of trips am:-	Trip rate total pm	Gives number of trips pm:-	Total trips
Affordable house 20%	250	0.265	66	0.362	90	
Private house	1000	0.562	562	0.667	667	
Affordable flat 20%	90	0.176	16	0.203	18	
Private flat	360	0.352	127	0.400	144	
	1700		771		920	1691

Number of trips using assumptions 35% Affordable and no flats per Design & Access Statement

House type	Housing mix per Design & Access	Trip rate total am	Gives number of trips am:-	Trip rate total pm	Gives number of trips pm:-	Total trips
Affordable house 35%	595	0.265	158	0.362	215	
Private house	1105	0.562	621	0.667	737	
Affordable flat	0					
Private flat	0					
	1700		779		952	1731

10.1.3 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.

10.2 Other transport issues

10.2.1 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.

10.2.2 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 on the main Aylesbury ring road.

Regardless of the modelling that has been carried out (and we question the assumptions – see above), we can predict the A418 junction suffering the same fate as the Watermead/Buckingham Park/A413 junction does already, that is, it would quickly become over-capacity. And this would then have a knock-on effect on the A418/ring road roundabout.

10.2.3 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 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.

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10.2.4 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. The figures shown in the report are as follows:

Behaviour of traffic coming from WLR at A413/WLR roundabout from flow plans Appendix C

	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.

10.2.5 A further question on this set of figures is why the existence of the new development 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 need.

11. 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 10.2.1 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.

12. Air Quality

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).

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.

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Summary

There are many areas in which the applicant's modelling assumptions, data and conclusions are 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, and we would urge AVDC to refuse planning permission for it.

We should also note our disappointment with the level of community involvement which the applicant has carried out, which has made it as difficult as possible for the public to become sufficiently informed and engaged to submit their individual comments. Even parish councils have not been properly served by the process.

- ❖ The original public exhibition in November was very poorly advertised and of insufficient duration, held in a location unsuitable for easy access by the most affected local residents.
- ❖ Despite being a direct neighbouring parish (our southern parish boundary forms the northern boundary of the application site), Weedon Parish Council was not officially notified of the submission of the application in a timely fashion. We only knew the plans had been submitted because residents in Watermead and Berton alerted us. AVDC notified us officially by email only after we contacted the planning officer.
- ❖ Not enough hard copies of plans were produced to give a full set to all neighbouring parish councils. When we requested these, we were told to "borrow them from another council", which we had to do in order to have them available for local residents to see at our parish council meeting.

Due to all of the above, we have found it challenging to submit our comments, and give ordinary residents the information to do so, within the set planning timescale. Indeed, we would not have been able to do this within the original 3-week expiry date; only the extension to 6 weeks because of the need for an Environmental Statement has made this possible.

Yours sincerely

Ruth Millard

Parish Clerk